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WILDERNESS RECOMMENDATIONS
FINAL ENVIRONMENTAL IMPACT STATEMENT

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
CARSON CITY DISTRICT
CARSON CITY, NEVADA

1987

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July 30, 1987

Dear Reader:

Enclosed for your information is the Walker Final Wilderness Environmental Impact Statement (EIS) and Proposed Recommendations. The final EIS analyzes the Carson City District's proposal to recommend release of the Gabbs Valley Range and Burbank Canyons Wilderness Study Areas in the Walker Resource Area as unsuitable for inclusion in the National Wilderness Preservation System.

The final EIS has been completed in accordance with the National Environmental Policy Act and concludes the study process; however, these recommendations may be subject to change through administrative review after receipt of the minerals reports from the Bureau of Mines and U S. Geological Survey. If significant information contained in the mineral reports indicates a need for change in the proposals analyzed in this EIS, a supplemental EIS will be issued and distributed for public review.

We appreciate your interest and involvement in the study process for these wilderness areas.

Sincerely,

Edward F. Spang
State Director, Nevada

Enclosure:
Walker Final Wilderness EIS (120 pp)

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FINAL ENVIRONMENTAL IMPACT STATEMENT

WILDERNESS RECOMMENDATIONS

for the

WALKER RESOURCE AREA

Prepared by

DEPARTMENT OF THE INTERIOR

BUREAU OF LAND MANAGEMENT

CARSON CITY DISTRICT

James W. Elliott
Carson City District Manager

Edward F. Spang
Nevada State Director

The proposed land use plan contains wilderness recommendations on 92,995 acres of public land in Mineral, Douglas, and Lyon Counties, Nevada. The action responds to the mandate of Section 603 of the Federal Land Policy and Management Act of 1976 to review all public land roadless areas of 5,000 acres or more and roadless islands having wilderness characteristics, determine their suitability or nonsuitability for wilderness designation, and report these suitability recommendations to the President no later than October 21, 1991.

For further information contact: Mr. John Matthiessen, Walker Resource Area Manager at 1535 Hot Springs Road, Suite 300, Carson City, Nevada 89706 or call (702) 885-6100.

Date final statement was made available to the Environmental Protection Agency and the Public:

SUMMARY

SUMMARY

This environmental impact statement (EIS) was developed from the Draft Walker Resource Area Resource Management Plan (RMP) and Environmental Impact Statement. Wilderness was one of three issues addressed in the Walker Resource Area RMP. This EIS is developed from material in the Walker Resource Area RMP/EIS that pertained to the Gabbs Valley Range Wilderness Study Area (WSA) and the Burbank Canyons WSA and the suitability of those areas for inclusion in the National Wilderness Preservation System. These WSAs cover 92,995 acres of public land. The study areas are located in western Nevada. This EIS assesses the environmental consequences of managing both WSAs as wilderness, non-wilderness, or partial wilderness.

Scoping, by the public and within the BLM, identified environmental issues for each WSA related to wilderness designation. For each WSA, a scenario of management actions was developed for the Proposed Action and for each alternative. The environmental consequences of each alternative were analyzed for each WSA based on the scenarios of management actions. A summary table of impacts for the Proposed Action and alternatives for each WSA follows the discussion of management actions for each WSA in Chapter 2.

GABBS VALLEY RANGE WSA - (NV-030-407) 79,600 acres

The Gabbs Valley Range WSA contains 79,600 acres of public land in Mineral County, Nevada, 25 miles northeast of Hawthorne and a four-hour drive southeast of Reno, Nevada. The terrain includes a mountain range of hills and rocky ridges dissected by canyons, and portions of adjacent outwash plains. Vegetation types include greasewood and shadscale (desert shrubs) at lower elevations and sagebrush, pinyon pine, and juniper at higher elevations.

Issues analyzed for the Gabbs Valley Range WSA include impacts to wilderness values, to motorized recreation, to mineral development, and to woodland product harvest.

The Proposed Action for the Gabbs Valley Range WSA is No Wilderness. Under this proposal, none of the 79,600 acres within the WSA would be designated as wilderness. The WSA would continue to be managed under the existing Walker Resource Management Plan. Three additional alternatives were also considered--Partial Wilderness Alternative A, in which 27,860 acres would be designated, Partial Wilderness Alternative B, in which 68,170 acres would be designated; and an All Wilderness Alternative, in which all 79,600 acres would be designated.

Moderate-sized open-pit gold mines are projected to be developed at three sites currently being explored, on the basis of valid, existing rights under all alternatives.

Under the Proposed Action, mineral exploration activities, including surface disturbance and the establishment and use of new roads, would cause a substantial reduction of the best wilderness values in the basin of Redrock Canyon. There would be no impacts to mineral exploration and development, motorized recreation, or fuelwood harvest.

Under Partial Wilderness Alternative A, wilderness designation of 27,860 acres would preserve the best wilderness values in the WSA, which are found in the secluded basin of Redrock Canyon, and prevent exploration for minerals and motorized recreation there. Designation would reduce the harvest of fuelwood by 2,700 cords. In the remaining 51,740 acres, there would be no impacts to mineral exploration and development, motorized recreation and fuelwood harvest, but these activities would reduce the net size of the area appearing primarily natural.

Under Partial Wilderness Alternative B, wilderness designation of 68,170 acres would preserve the best wilderness values in the WSA, found in the basin of Redrock Canyon, plus an additional 40,310 acres of natural area. Designation would prevent mineral exploration and motorized recreation on 68,170 acres and reduce the fuel harvest of 3,600 cords. On the remaining 11,430 acres, there would be no impacts of mineral exploration, motorized recreation, or fuelwood harvest.

Under the All Wilderness Alternative, wilderness designation of 79,600 acres would preserve the best wilderness values on the basin of Redrock Canyon plus an additional 51,395 acres. Naturalness would be lost on about 345 acres due to the operation of three open-pit mines having valid, existing rights. Designation on 79,600 acres would prevent mineral exploration, 62 visitor-days of motorized recreation, and harvest of 5,600 cords of fuelwood in the WSA.

BURBANK CANYONS WSA - (NV-030-525a) 13,395 acres

The majority of the Burbank Canyons WSA (12,330 acres) is located in Douglas County, Nevada, approximately five miles northwest of Wellington, Nevada. Approximately 1,065 acres along the western edge of the unit are located in Lyon County. The WSA is a one- to two-hour drive from Reno, Nevada. The topography includes mountain ridges and canyons. The main vegetation type is pinyon pine, juniper, and sagebrush; meadows and riparian vegetation occur along drainages.

Issues analyzed for the Burbank Canyons WSA include impacts on wilderness values and on mineral development.

The Proposed Action for the Burbank Canyons WSA is No Wilderness. Under this proposal, none of the 13,395 acres would be designated wilderness. The WSA would continue to be managed under the existing Walker Resource Management Plan, which provides for designation as a scenic area and closure to off-road vehicle use. Two additional alternatives were considered--a Partial Wilderness Alternative, in which 9,970 acres would be designated, and an All Wilderness Alternative, in which 13,395 acres would be designated.

Three moderate-sized gold mines are projected to be developed from two mines and one active claim group in the WSA on the basis of valid, existing rights under all alternatives.

Under the Proposed Action, the best wilderness values, found in Burbank Canyon, would be little impacted by exploration for and development of minerals, but nor would they receive legislative protection. Exploration and development activities would cause a reduction of naturalness around all sides of the WSA. There would be no impact to exploration for or development of mineral resources.

Under the Partial Wilderness Alternative, wilderness designation of 9,970 acres would preserve most of the wilderness values in the WSA, including the best of these values in Burbank Canyon. Mineral exploration would be prevented in the 9,970-acre wilderness. Mining and mineral exploration on all sides of the WSA would reduce naturalness around the periphery.

Under the All Wilderness Alternative, wilderness designation would preserve most of the wilderness values in the WSA, including the best of these values in Burbank Canyon. Exploration for minerals would be prevented, but three gold-mining operations would proceed on the basis of valid, existing rights.

TABLE OF CONTENTS

TABLE OF CONTENTS

	Page
SUMMARY	i
TABLE OF CONTENTS	iv
LIST OF TABLES	vii
LIST OF MAPS	vii
LIST OF PHOTOS	vii
CHAPTER 1 - INTRODUCTION	
Purpose and Need for the Proposed Action	1-1
The Wilderness Review Process and Its Integration with Planning	1-2
Environmental Issue Identification--Scoping	1-3
Gabbs Valley Range WSA	1-3
Burbank Canyons WSA	1-4
Issues Considered But Not Selected	1-4
Selection of the Proposed Actions and Development of Alternatives	1-8
CHAPTER 2- THE PROPOSED ACTIONS AND ALTERNATIVES	
Gabbs Valley Range	2-1
Proposed Action (No Wilderness)	2-1
Minerals Management Actions	2-1
Recreation Management Actions	2-3
Woodlands Management Actions	2-3
Water and Riparian Management Actions	2-3
Livestock Grazing Management Actions	2-4
Wild Horse Management Actions	2-4
Partial Wilderness Alternative A	2-4
Partial Wilderness Alternative B	2-8
All Wilderness Alternative	2-12
Burbank Canyons WSA	2-15
Proposed Action (No Wilderness/No Action)	2-15
Minerals Management Actions	2-15
Recreation Management Actions	2-16
Livestock Grazing Management Actions	2-17
Partial Wilderness Alternative	2-17
All Wilderness Alternative	2-20

Page

CHAPTER 3 - AFFECTED ENVIRONMENT

Gabbs Valley Range WSA. 3-1
Wilderness Values 3-1
Naturalness 3-1
Opportunity for Solitude 3-2
Opportunity for Primitive and Unconfined Recreation 3-2
Special Features. 3-2
Minerals and Energy Values. 3-3
Riparian Sites and Springs. 3-4
Livestock Grazing 3-4
Wild Horses 3-4
Wildlife. 3-5
Woodland Products 3-5
Lands 3-5
Recreation. 3-5
Cultural Resources. 3-5
Burbank Canyons WSA 3-6
Wilderness Values 3-6
Naturalness 3-6
Opportunity for Solitude. 3-7
Opportunity for Primitive and Unconfined Recreation. 3-7
Special Features. 3-7
Minerals and Energy 3-8
Livestock Grazing 3-9
Wildlife. 3-9
Woodland Products 3-9
Recreation. 3-10
Cultural Resources. 3-10

CHAPTER 4 - ENVIRONMENTAL CONSEQUENCES

Gabbs Valley WSA. 4-1
Proposed Action (No Wilderness/No Action) 4-1
Impact on Wilderness Values 4-1
Impacts on Minerals Development. 4-3
Impact on Motorized Recreation Use. 4-3
Impacts on Fuelwood Harvest 4-3
Relationship Between Local Short-term Uses of Man's Environment and the Maintenance and Enhancement of Long-term Productivity. 4-4
Irreversible and Irretrievable Commitments of Resources . . . 4-4
Partial Wilderness Alternative A. 4-4
Partial Wilderness Alternative B. 4-7
All Wilderness Alternative. 4-11

Page

Burbank Canyons WSA 4-13
Proposed Action (No Wilderness/No Action) 4-13
Impact on Wilderness Values 4-13
Impact on Mineral Development 4-15
Relationship Between Local Short-term uses of Man's Environment and the Maintenance and Enhancement of Long-term Productivity. 4-15
Irreversible and Irretrievable Commitments of Resources . . . 4-15
Partial Wilderness Alternative. 4-15
All Wilderness Alternative. 4-18

CHAPTER 5 - CONSULTATION AND COORDINATION

Public Involvement. 5-1
Consistency with Other Plans 5-2
Distribution of the Draft EIS 5-3
Public Comments on the Draft EIS. 5-5

LIST OF PREPARERS. 5-39

LIST OF TABLES

Number	Title	Page
Table 1	Alternatives by WSA.	1-9
Table 2	Comparison of Impacts--Gabbs Valley Range WSA	2-23
Table 3	Comparison of Impacts--Burbank Canyons WSA.	2-25

LIST OF MAPS

Number	Title	Page
Map 1	Walker Resource Area.	1-10
Map 2	Gabbs Valley Range WSA--Proposed Action and Alternatives.	2-26
Map 3	Gabbs Valley Range WSA--Existing Situation.	3-11
Map 4	Gabbs Valley Range WSA--Metallic Mineral Potential. . . .	3-12
Map 5	Gabbs Valley Range WSA-- Nonmetallic and Geothermal Resource Potential.	3-13
Map 6	Burbank Canyons WSA--Proposed Action and Alternatives . .	2-27
Map 7	Burbank Canyons WSA--Existing Situation	3-14
Map 8	Burbank Canyons WSA--Mineral Potential.	3-15

LIST OF PHOTOS

Number	Title	Page
Photo 1	. . . . .	3-16
Photo 2	. . . . .	3-16
Photo 3	. . . . .	3-17
Photo 4	. . . . .	3-17

CHAPTER ONE

INTRODUCTION AND PLANNING PROCESS

CHAPTER 1

INTRODUCTION

This Environmental Impact Statement (EIS) considers the possible consequences of wilderness designation, partial wilderness designation, and non-designation for each of two wilderness study areas (WSAs) in the Walker Resource Area, Carson City District, Nevada (Map 1, page 1-10).

The WSAs studied in this EIS include:

WSA No.	WSA Name	Size (acres)	County
NV-030-407	Gabbs Valley Range	79,600	Mineral
NV-030-525A	Burbank Canyons	13,395	Douglas, Lyon

The Walker Resource Area also contains the 550-acre Carson Iceberg WSA in Alpine County, California, and the Alpine County portion of the 6,350-acre Slinkard WSA. The Bureau of Land Management California State Office is taking the lead in the preparation of wilderness studies and environmental impact statements for both of these along with others in California, so this EIS does not pertain to them.

The Walker Resource Area extends from 30 to 120 miles southeast of Reno, Nevada, and 200 miles east of Sacramento, California. It lies within the semi-arid Great Basin Topographic Region, characterized by north-south trending mountain ranges separated by lowland valleys. The major vegetation types are saltbush-greasewood, Great Basin sagebrush, and pinyon-juniper woodland.

PURPOSE AND NEED FOR THE PROPOSED ACTION

The purpose of the Proposed Action is to manage public lands and natural resources within the Gabbs Valley Range and Burbank Canyons WSAs for multiple uses and release them from further consideration for preservation as wilderness.

This study evolves from a requirement included by Congress in Section 603 of the Federal Land Policy and Management Act of 1976 (FLPMA) directing the Secretary of the Interior and the Bureau of Land Management (BLM) to review roadless areas of 5,000 acres or more having wilderness characteristics and by October 21, 1991, to recommend to the President the suitability or nonsuitability of such areas for preservation as wilderness. In determining these wilderness values, the law directs the Bureau to use the criteria given by Congress in the Wilderness Act of 1964. In Section 2(c) of the Act, Congress states that wilderness is essentially an area of undeveloped Federal land in a natural condition, without permanent improvements or human habitation, which has outstanding opportunities for solitude or a primitive and unconfined type of recreation. The area may contain ecological, geological, or other features of scientific, educational, scenic, or historical value.

THE WILDERNESS REVIEW PROCESS AND ITS INTEGRATION WITH PLANNING

To accomplish the mandate of Section 603 of FLPMA, the BLM developed a wilderness review process containing three phases: inventory, study, and reporting.

The inventory phase of this process, initiated in 1978, involved examining the public lands to locate areas containing wilderness characteristics that met the criteria established in the Wilderness Act. Areas clearly lacking wilderness characteristics were sorted out from lands that might have those characteristics. This intensive inventory was then followed by a 90-day public review period, after which final WSAs were identified.

In the Nevada portion of the Walker Resource Area, two areas totaling 92,995 acres were found to have wilderness characteristics. The Gabbs Valley Range WSA (NV-030-407) contains 79,600 acres and the Burbank Canyons WSA (NV-030-525a) 13,395 acres.

This inventory process and a general description of all of Nevada's WSAs are given in Wilderness: Final Intensive Inventory, Public Lands Administered by BLM Nevada (1979). A copy of this publication is available at any BLM office in Nevada.

In the California portion of the Walker Resource Area, two other areas were found to have wilderness characteristics--the Slinkard and Carson Iceberg WSAs. These are not contiguous with the WSAs in the Nevada portion of the Walker Resource Area. The 6,350-acre Slinkard WSA in Alpine and Mono Counties lies within both the Bishop Resource Area of the Bakersfield District and the Walker Resource Area. The 550-acre Carson Iceberg WSA lies in Alpine County. The BLM California State Office has taken the lead in preparation of wilderness study and EIS documents for both of these along with others in California. This EIS does not refer to them further.

The second step in the review process was to integrate wilderness evaluation into the BLM Planning System (43 CFR 1600), which in this case involved development of the Walker Resource Area Resource Management Plan (RMP). The wilderness study criteria and quality standards containing the BLM's Wildernesss Study Policy: Policies, Criteria and Guidelines for Conducting Wilderness Studies on Public Lands (47 CFR 5098-5122) were applied to each WSA.

In addition to the above referenced criteria and standards, issues for discussion were identified through public comment and internal scoping. Conflicts were analyzed and alternatives developed. See page 1-7 for a discussion of which alternatives were selected and why. These alternatives are the basis for analysis of environmental consequences and resource trade-offs.

Following public review of the draft environmental impact statement, the Bureau prepared this final environmental impact statement and forwarded it to the Secretary of the Interior, who will file it along with his recommendation to the President. The President has up to two years to make his final recommendation to Congress, which has sole authority to designate an area as wilderness. Until Congress decides whether or not to designate an area as wilderness, the WSAs will be managed in accordance with the Bureau's Interim Management Policy and Guidelines for Lands Under Wilderness Review.

ENVIRONMENTAL ISSUE IDENTIFICATION/SCOPING

The scoping process for the Walker Wilderness EIS encompassed issues identified by the BLM staff, by the public during a formal scoping comment period in April and May of 1983 and at a public meeting held in Hawthorne in April, 1985, and from comments on the draft EIS by the public and by federal, state, and local agencies. During the scoping period, there was consultation with the Nevada State Historic Preservation Officer concerning the presence of absence of cultural resources in the WSAs that would be eligible for nomination for listing on the National Register of Historic Places. The United States Fish and Wildlife Service was consulted concerning the potential effects of wilderness designation on threatened or endangered species. The environmental issues identified for analysis in this EIS as a result of the scoping process are presented below for each WSA.

The following discussion identifies the issues which are to be analyzed in detail in the EIS for each WSA. In addition, the reasons are given for setting aside the remaining issues that are not included in the EIS for further consideration.

Gabbs Valley Range WSA

- Impacts on Wilderness Values

  The wilderness values of naturalness, opportunity for solitude, opportunity for primitive recreation, and special features of the WSA would be preserved by wilderness designation, and they may be adversely affected by uses and actions that would occur should the WSA not be designated wilderness. These beneficial or adverse impacts constitute an issue for analysis in the EIS.

- Impacts on Development of Mineral Resources

  Wilderness designation would affect the exploration for and development of mineral resources by withdrawing designated lands from mineral entry. The impact of wilderness designation on the development of mineral resources is therefore an issue for analysis in the EIS.

- Impacts on Motorized Recreation

  Wilderness designation would eliminate legal motorized recreation. Eliminating this use would affect the availability of recreation opportunities--particularly hunting and trapping--, and shift use currently occurring in the WSA to adjacent lands. The impact of wilderness designation on motorized recreation in the Gabbs Valley Range WSA is an issue for analysis in the EIS.

- Impacts on Woodland Product Harvest

  Woodlands suitable for fuelwood production exist within the Gabbs Valley Range WSA. Wilderness designation would impact the availability of this product within the Walker Resource Area. The impact of wilderness designation on the harvest of woodland products is a topic for analysis in the discussion of the Gabbs Valley Range WSA in the EIS.

Burbank Canyons WSA

- Impacts on Wilderness Values

  The wilderness values of naturalness, opportunity for solitude, opportunity for primitive recreation, and special features of the WSA would be preserved by wilderness designation, and they may be adversely affected by uses and actions that would occur should the WSA not be designated wilderness. These beneficial or adverse impacts constitute an issue for analysis in the EIS.

- Impacts on Development of Mineral Resources

  Wilderness designation could affect the development of potential and known mineral resources by withdrawing designated lands from mineral entry. Exploration for and development of mineral resources within designated wilderness areas could be affected by wilderness management restrictions. The impact of wilderness designation on the anticipated development of mineral resources is therefore an issue for analysis in the EIS.

ISSUES CONSIDERED BUT NOT SELECTED

The following issues were identified in scoping but were not selected for detailed analysis in the EIS. The reasons for setting aside these issues are discussed below.

- Impacts on Motorized Recreation - Burbank Canyons WSA

  Upon close examination, impact on motorized recreation in the Burbank Canyons WSA was determined not to be significant enough to be analyzed in the EIS. Most of the area is inaccessible to vehicles due to steep terrain. The Bureau has made the decision, through the Walker RMP, to close the entire area to the use of motorized vehicles. Therefore, motorized recreation would not be allowed under any of the alternatives, and impacts upon it do not constitute a significant issue for analysis in this EIS.

- Impacts to Geothermal Development - Burbank Canyons WSA

While the potential for geothermal development may be present in the eastern side of the Burbank Canyons WSA, geothermal leasing would not likely be allowed there under any of the alternatives. Even if no wilderness were designated, the Burbank Canyons WSA is already a designated scenic area, and geothermal development would not be compatible with management of the scenic resources there. Therefore these impacts are not an issue.

- Impacts on Woodland Product Harvest - Burbank Canyons WSA

About 500 acres of woodland in the Burbank Canyons WSA could be harvested for fuelwood. However, demand for that product is low in that area, and no sales are anticipated in the WSA even if the area were not designated wilderness. Other sources of fuelwood abound nearby. Therefore, impact on fuelwood harvest is not a significant issue.

- Impacts on Riparian Areas

Comments by the Wilderness Society, U.S. Fish and Wildlife Service, and U.S. Environmental Protection Agency raised concern about the effects of the Proposed Action and alternatives upon riparian areas. Several small riparian sites needing protection from grazing animals at springs in the Gabbs Valley Range WSA will be protected regardless of wilderness designation or nondesignation. Riparian areas in the Burbank Canyons WSA are in good condition, and only five acres or fewer of the 300 acres of riparian habitat would be impacted by projected mineral exploration and development. Most of the anticipated mining and exploration would occur away from riparian zones. Cattle have not grazed in the area for several years, and grazing has not degraded riparian areas in the WSA. Wilderness designation would not preclude grazing, and riparian protection measures would be taken if necessary even if the area were not designated wilderness. Motorized vehicles would not significantly impact riparian areas, because the area is largely inaccessible to vehicles. The values of naturalness and special features, which are to be considered under the issue of "impacts to wilderness values" mentioned above, include riparian areas. Therefore, riparian protection will not be considered a separate issue in this EIS but is addressed as part of the larger issue of impacts to wilderness values throughout the EIS.

- Impacts on Wildlife

Comments by WHOA, Mr. Reed Second, Sierra Club, and U.S. Fish and Wildlife Service on the draft RMP/EIS expressed a general concern for wildlife or wildlife habitat. Specific issues pertaining to wilderness were not identified. While deer, mountain lions, bobcats, sage grouse, chukar, quail, eagles and other raptors, many songbirds, rodents, and reptiles inhabit both WSAs, based on the projections of development in the two WSAs, impacts to wildlife populations or habitats--including riparian habitats--are not anticipated to be of a magnitude to warrant detailed analysis in the EIS.

- Impacts on Endangered Species

Wildlife and vegetation inventories and consultation with the U.S. Fish and Wildlife Service did not identify any threatened or endangered species that would be adversely affected in either WSA. While the northern side of the WSA, along Red Canyon, is part of a much larger area which a bald eagle uses for winter hunting, no actions are anticipated which would affect it or its habitat under any alternative. Therefore, this issue was dropped from further consideration.

- Impacts on Air Quality

The U.S. Environmental Protection Agency raised concerns regarding the interaction between wilderness designation and air quality classification. No anticipated management actions under the alternatives would greatly lessen air quality. Mineral exploration and development would contribute to airborn dust, but this impact would not be of large enough magnitude to be considered a significant issue. Air quality and potential air pollution would be regulated by Nevada Division of Environmental Protection and would not be expected to exceed legal standards. Therefore, this issue was dropped from further analysis in the EIS.

- Impacts on Cultural Resources

Inventories and consultation with the State Historic Preservation Officer during scoping determined that no cultural resource sites which would be eligible for nomination for listing on the National Register of Historic Places are known to exist within either of the WSAs. The cultural sites that do exist in these areas include prehistoric pictographs, a rock shelter, and historic mining works, which would be protected by historic preservation laws with or without wilderness designation. Since the significance of the cultural sites within the WSAs is low, the issue of impacts on cultural resources from wilderness designation was dropped from further analysis.

- Consideration of Other Areas for Wilderness

Comments received during scoping advocated designation of wilderness in Stewart Valley, which contains unique fossils, and the East Walker River area. However, these were inventoried for wilderness characteristics and found not to meet the criteria necessary to qualify for wilderness study. The Bureau is therefore using other means to protect resources in these areas, including area of critical environmental concern designation, scenic area designation, segregation and withdrawal from mineral entry, off-road vehicle limitations, enforcement of antiquities laws, and regulation of fossil collecting.

- Impacts on Wild Horses

Management of wild horse populations was analyzed as part of the issue of rangeland grazing management for the Walker RMP. Wild horses do not inhabit the Burbank Canyons WSA. While the wild horses in the Gabbs Valley Range are recognized as a special feature enhancing wilderness values there, this value would not be diminished by wilderness designation or nondesignation. Less than two percent of horse habitat at most in the WSA would be disturbed by mineral exploration and development. Therefore, impacts upon wild horses will not be addressed as an issue for analysis in this EIS.

- Military Overflights

The U.S. Air Force noted that jet pilots occasionally fly over the Gabbs Valley Range WSA. This point is reflected in the EIS narrative. Such overflights have become a major issue to some people in parts of Nevada, but the occassional flights over the general vicinity of the Gabbs Valley Range have apparently not become an issue.

- Impacts on Livestock Grazing

Comments such as one in the letter from the Wilderness Society, expressed concern that the Draft Walker RMP implied that grazing by livestock would not be allowed in wilderness areas. The "no grazing" and "all wilderness" features were combined in Alternative E of the RMP for purposes of analysis--not to imply that wilderness precluded grazing. In both the Gabbs Valley Range and Burbank Canyons WSAs, grazing would continue regardless of wilderness designation or nondesignation. It is therefore not an issue for analysis in the EIS.

SELECTION OF THE PROPOSED ACTION AND DEVELOPMENT OF ALTERNATIVES

Development of the Proposed Action is guided by requirements of the Bureau's Planning Regulations, 43 CFR Part 1600. The BLM's Wilderness Study Policy (published February 3, 1982, in the Federal Register) supplements the planning regulations by providing specific factors to be considered during the planning sequence in developing suitability recommendations.

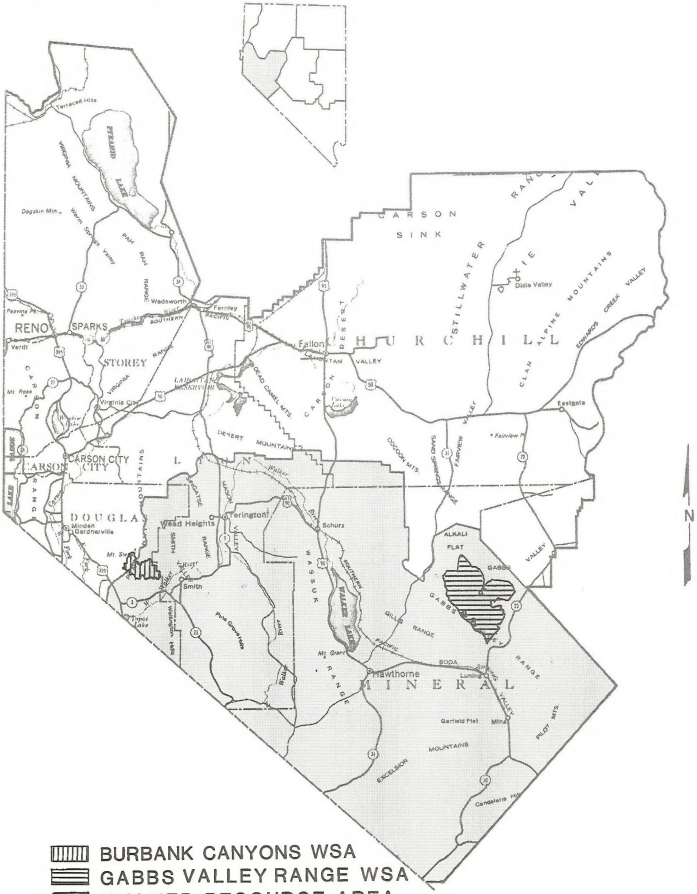
Because the Walker RMP/DEIS addressed other land-use planning issues in addition to wilderness, more alternatives had been developed to provide an adequate range for analysis than are needed in this FEIS to analyze the impacts of only the wilderness issue (Table 1, Page 1-9). For both WSAs, the FEIS Proposed Actions were derived from the RMP/DEIS "Alternative A" and Preferred Alternative "B". In this FEIS, the Proposed Actions correspond to the No Action and No Wilderness Alternatives. For both WSAs, the FEIS All Wilderness Alternatives were derived from the wilderness portions of the RMP/DEIS "Alternative E." The no-grazing features of RMP/DEIS "Alternative E" did not pertain to the wilderness issue and are not included in the FEIS All Wilderness Alternative.

For the Gabbs Valley Range WSA, the FEIS Partial Wilderness Alternative A was derived from RMP/DEIS "Alternative C," and FEIS Partial Wilderness Alternative B was derived from RMP/DEIS "Alternative D." For the Burbank Canyons WSA, the FEIS Partial Wilderness Alternative was derived from RMP/DEIS Alternatives "C" and "D", which were essentially the same.

Table 1

Alternatives by WSA

Final EIS Alternative	Draft EIS Alternative	Suitable Acreage	Nonsuitable Acreage
	Gabbs Valley Range WSA		
Proposed Action (No Wilderness/No Action)	Alternatives A and B	0	79,600
Partial Wilderness Alternative A	Alternative C	27,860	51,740
Partial Wilderness Alternative B	Alternative D	68,170	11,430
All Wilderness Alternative	Alternative E	79,600	0
	Burbank Canyons WSA		
Proposed Action (No Wilderness/No Action)	Alternatives A and B	0	13,395
Partial Wilderness Alternative	Alternatives C and D	9,970	3,425
All Wilderness Alternative	Alternative E	13,395	0



BURBANK CANYONS WSA
GABBS VALLEY RANGE WSA
WALKER RESOURCE AREA

CARSON CITY DISTRICT

Walker Resource Management Plan (RMP) Area

MAP 1

CHAPTER TWO

PROPOSED ACTION AND ALTERNATIVES

CHAPTER 2

THE PROPOSED ACTION AND ALTERNATIVES

The Proposed Action and alternatives are described below for each WSA in terms of the patterns of management activities which would occur under each alternative. Since the pattern of future management actions within the WSAs cannot be predicted with certainty, assumptions were made to allow the analysis of impacts. These assumptions are the basis of the impacts identified in this EIS. They are not management plans or proposals but represent feasible patterns of activities which could occur under the alternatives analyzed.

GABBS VALLEY RANGE WSA
(NV-030-407)

PROPOSED ACTION (NO WILDERNESS)	0 Acres Suitable for Wilderness 79,600 Acres Nonsuitable for Wilderness

Under the Proposed Action (Map 2, page 2-25), none of the 79,600 acres would be designated wilderness. All would be managed for multiple uses under the guidance of the BLM's Walker Resource Management Plan. Motorized vehicle use could continue. Mineral entry, exploration and development would be allowed. Grazing by livestock and wild horses would continue at present levels. The following scenario of expected likely activities is estimated for use in this analysis.

Minerals Management Actions

Under the Proposed Action, the entire area would again be open to all mineral entry. It is projected that three currently or previously active gold mining properties described below would be expanded resulting in a total surface disturbance of 340 acres within the WSA. Exploration activities on 496 unpatented claims would result in disturbance of a total of 1,250 acres at the rate of about 25 acres per year, mostly in the southwest and northern portions of the WSA.

In the Petrified Wash area at the southern side and entirely within the WSA, one gold-mining company has grandfathered mineral rights and has been conducting an intensive exploration program in protracted sections 22 and 23 of T. 9 N., R. 34 E. It is projected that the firm would prove and develop the ore body which it is attempting to evaluate. Development would consist of an open-pit mine impacting about 50 acres at its completion. The disseminated gold ore in an epithermal gold ore deposit is amenable to cyanide heap-leaching, which would be conducted on-site in accordance with applicable state laws, including the requirement to obtain a "zero-discharge" permit from the Nevada Division of Environmental Protection. That agency would

also regulate dust-generating activities. A system of leach pads and ponds would be constructed in Sections 23 and 24 involving 40 acres. An access road system would be created which, including the two miles of existing roads, would total about 10 miles (average width 30 feet; 36 acres). Office, maintenance shop, laboratory, pads and ponds, mine dumps, and four miles of power-line with maintenance roads would account for another 40 acres of disturbance. A total disturbance area of about 170 acres is anticipated on small ridgetops, sideslopes, and in minor ravines within the present boundaries of the WSA. No riparian areas would be affected.

Another company has for several years been conducting an intensive geophysical exploration and drilling program in the vicinity of Poinsettia Spring Mine at the northern end of the WSA. The firm would develop an open-pit gold mine complex extending out of the "cherry-stemmed" exclusion and into the northwestern portion of the WSA. The shallow epithermal gold deposit would be followed in Sections 27, 28, and 34 (T. 11 N., R. 33 E). In all, the pit complex and attendent road network would disturb 100 acres; 40 acres, including 0.7 miles of 60-foot-wide road, would be in low, rolling hills inside the WSA boundaries. An ore-processing facility would be constructed on more favorable terrain northwest of the spring (about three miles west of Superstition Canyon); this facility would be almost entirely on land outside the WSA (5 to 10 acres of WSA impacted). Mine waste dumps in the WSA would impact 20 acres. No riparian areas would be affected. Nevada Division of Environmental Protection would regulate generation of airborn particulate matter. Altogether, about 70 acres of the WSA would be disturbed by the mining program.

Renewed interest in the currently inactive Civit Cat Mine would lead to expansion of gold mine development beyond the historically mined area in Section 20 of T. 9 N., R. 34 E., and into the WSA in small canyons in Section 17 and Section 21. It is anticipated that the disseminated gold ore deposit would be followed into the WSA, where two small open-pit gold mining operations would disturb a total of 60 acres. The pit in Section 17 would occupy 35 acres, and the one in Section 21 would take 25 acres. Three miles of 60-foot-wide haul roads associated with the two pits would add 20 acres of disturbance. Four 2.5-acre waste dumps (two of them for stockpiling overburden for later use in site reclamation), 22 drill pads totaling 5 acres, and four staging areas (10 acres together) would add another 25 acres for a minimum total of 105 acres of disturbance. Nevada Division of Environmental Protection would regulate generation of airborn particulate matter. No riparian areas in the WSA would be affected.

Mineral exploration on 496 unpatented claims would result in disturbance of a total of 1,250 acres at the rate of about 25 acres per year in a two-mile radius of Poinsettia Spring Mine and in a three-mile wide strip along the southwest side, all within the WSA. No riparian areas occur within these parts of the WSA. Exploration activities would entail construction of drill-pads, drilling sumps, small trenches dug by backhoe, larger bulldozed trenches, off-road motor vehicle travel, and 11 miles of access road per year.

Recreation Management Actions

Under the Proposed Action, all 79,600 acres would remain designated open for the use of motorized vehicles. This includes approximately 22 miles of vehicle ways that exist in the WSA as well as ten miles of cherrystemmed roads. Motorized recreation includes primarily trapping, hunting for deer and upland game, and sightseeing. The current estimated 78 visitor-days of recreation annually (80 percent motorized, 20 percent non-motorized) would increase to 140 visitor-days (130 visitor-days motorized), due to the establishment of 11 miles of new road per year for mineral exploration. Six miles of additional primitive vehicle routes would gradually become established by repeated vehicle use where terrain is suitable for it at the southern, northern, and eastern sides of the WSA. No management of either dispersed recreation or recreational facilities would be planned.

Woodlands Management Actions

Under the Proposed Action, as many as 1,600 cords of pinyon pine and juniper would be sold to commercial woodcutters from 400 acres in three areas along the southwest side of the WSA over the next 50 years within the WSA boundaries. The locations would be in Section 23 of T. 10 N., R. 33 E.; Section 29 of T. 10 N., R. 34 E.; and Section 5 of T. 9 N., R. 34 E. The sales would be conducted at a rate of one sale of 100 cords on 25 acres every three years. Another 1,000-acre area would be opened to non-commercial public cutting of a total of 4,000 cords in the Petrified Wash area at the south side of the WSA (Sections 14 and 23 in T. 9 N., R. 34 E.) if the public were no longer able to cut firewood for free in an existing cutting area in the Toiyabe National Forest near Gabbs. No riparian areas occur in these parts of the WSA. Cutting would proceed at the estimated rate of 100 cords per year. No new roads would be constructed, but approximately six miles of vehicle ways would become established in the cutting areas. Some plants would be damaged by motorized vehicle use, but soil erosion would be minimal. Cutting areas would be open the year around, but most cutting would occur between April through December. Demand for wood at this location is modest, and wood is readily available elsewhere in the vicinity.

Water and Riparian Management Actions

Six of the nine springs within the WSA would be developed and maintained to protect the sources and associated small riparian sites from trampling and overgrazing by livestock and wild horses and to provide water for wild horses, wildlife, livestock, and humans. Development would entail fence exclosures, spring boxes, water pipes, troughs outside the exclosures for wild horses and livestock, and troughs inside the exclosures for wildlife. Motor vehicle access would be used to inspect and maintain the development at Upper Petrified Spring (on two miles of jeep trail way), at Corral Spring (on one mile of jeep trail way), and Bobcat Spring (on three miles of jeep trail way and two miles of driving through the wash in Paint Rock Canyon).

Livestock Grazing Management Actions

Under the Proposed Action, livestock use within the WSA would continue to be allotted to one operator within the Pilot Mountain/Table Mountain Allotment. Cattle use of about 4,225 animal unit months of forage per year within the WSA during winter would continue for the forseeable future.. No future range improvements are proposed, and none are likely to be needed in the forseeable future.

Wild Horse Management Actions

Wild horses ranging within the Gabbs Valley Range WSA would be managed according to the Pilot Mountain Herd Area Management Plan. Excess animals would accordingly be gathered and removed when necessary to maintain the population within the limits of habitat carrying capacity. The method of capture would be to herd horses by helicopter into temporary corral traps at selected sites easily accessible by livestock trucks. The WSA would support a maximum of about 400 head, at which point the Bureau would reduce that number to an initial management level of about 150. Still more horses range within the Pilot Mountain Herd Area outside the WSA. Exclosure fences around small riparian sites at six developed springs would be maintained to protect from trampling and overgrazing by wild horses and livestock.

PARTIAL WILDERNESS ALTERNATIVE A:	27,860 Acres Suitable for Wilderness
(Gabbs Valley Range WSA)	51,740 Acres Nonsuitable for Wilderness

Under Partial Wilderness Alternative A (Map 2, page 2-25), 27,860 acres would be recommended suitable for wilderness. This portion would be managed to preserve wilderness values, and motorized vehicle use, fuelwood harvest, and mineral exploration would be prohibited. Grazing by wild horses and livestock would continue as at present. The remaining 51,740 acres would be managed for multiple use. The rationale for this alternative would be to designate wilderness in the portion of the WSA containing only the best of the wilderness values and to allow other land and resource uses to continue in the rest of the WSA. The following scenario of expected likely actions is estimated for use in this analysis.

Minerals Management Actions

The 27,860 acres of the WSA designated wilderness would be withdrawn from all forms of mineral entry including mineral leasing. No new claims could be staked. No exploration would be allowed on the 50 claims existing in the wilderness. No mining would occur in the wilderness, due to the projected absence of any valid, existing rights.

The remaining 51,740 acres not designated wilderness would be open to mineral entry. The three gold-mining operations projected to operate in the vicinity of Petrified Wash, Poinsettia Spring Mine, and Civit Cat Mine under the Proposed Action would operate unaffected by wilderness designation. Resumption of exploration activities on 446 existing claims would disturb a total of 1,000 acres at the rate of 20 acres per year along the southwest and northern portions of the WSA. No riparian areas in the WSA would be affected by these activities, which are further described below.

In the Petrified Wash area at the southern side and entirely within the WSA, one gold-mining company has grandfathered mineral rights and has been conducting an intensive exploration program in protracted sections 22 and 23 of T. 9 N., R. 34 E. It is projected that the firm may prove and develop the ore body which it is attempting to evaluate. Development would consist of an open-pit mine impacting about 50 acres at its completion. The disseminated gold ore in an epithermal gold ore deposit is amenable to cyanide heap-leaching, which would be conducted on-site in accordance with applicable state laws, including the requirement to obtain a "zero-discharge" permit from the Nevada Division of Environmental Protection. A system of leach pads and ponds would be constructed in Sections 23 and 24 involving 40 acres. An access road system would be created which, including the two miles of existing roads, would total about 10 miles (average width 30 feet; 36 acres). Office, maintenance shop, laboratory, pads and lands, mine dumps, and four miles of power-line with maintenance roads would account for another 40 acres of disturbance. Nevada Division of Environmental Protection would regulate generation of airborn particulate matter. A total disturbance area of about 170 acres is anticipated on small ridgetops, sideslopes, and in minor ravines within the present boundaries of the WSA.

Another company has for several years been conducting an intensive geophysical exploration and drilling program in the vicinity of Poinsettia Spring Mine at the northern end of the WSA. The firm would develop an open-pit gold mine complex extending out of the "cherry-stemmed" exclusion and into the northwestern portion of the WSA. The shallow epithermal gold deposit would be followed in Sections 27, 28, and 34 (T. 11 N., R. 33 E). In all, the pit complex and attendent road network would disturb 100 acres; 40 acres, including 0.7 miles of 60-foot-wide road, would be in low, rolling hills inside the WSA boundaries. An ore-processing facility would be constructed on more favorable terrain northwest of the spring (about three miles west of Superstition Canyon); this facility would be almost entirely on land outside the WSA (5 to 10 acres of WSA impacted). Mine waste dumps in the WSA would impact 20 acres. Nevada Division of Environmental Protection would regulate generation of airborn particulate matter. Altogether, about 70 acres of the WSA would be disturbed by the mining program.

Renewed interest in the currently inactive Civit Cat Mine would lead to expansion of gold mine development beyond the historically mined area in Section 20 of T. 9 N., R. 34 E., and into the WSA in small canyons in Section 17 and Section 21. It is anticipated that the disseminated gold ore deposit would be followed into the WSA, where two small open-pit gold mining operations would disturb a total of 60 acres. The pit in Section 17

would occupy 35 acres, and the one in Section 21 would take 25 acres. Three miles of 60-foot-wide haul roads associated with the two pits would add 20 acres of disturbance. Nevada Division of Environmental Protection would regulate generation of airborn particulate matter. Four 2.5-acre waste dumps (two of them for stockpiling overburden for later use in site reclamation), 22 drill pads totalling 5 acres, and four staging areas (10 acres together) would add another 25 acres for a minimum total of 105 acres of disturbance.

Mineral exploration on 446 unpatented claims would result in disturbance of a total of 1,000 acres at the rate of about 20 acres per year in a two-mile radius of Poinsettia Spring Mine and in a two-mile wide strip along the southwest side, all within the WSA. Exploration activities would entail construction of drill-pads, drilling sumps, small trenches dug by backhoe, larger bulldozed trenches, and eight miles of access road.

Recreation Management Actions

Under Partial Wilderness Alternative A, 27,860 acres would be closed to the use of motorized vehicles. Approximately six miles of existing vehicle routes would be closed, eliminating 12 visitor-days per year of motorized recreation. Non-motorized recreation would slowly increase from 10 to 42 visitor-days per year within the 27,860 acres of wilderness as a result of formal wilderness designation and consequently increased public awareness of the area. No new trails would be constructed or needed to facilitate back country travel, but footpaths would become established by repeated use.

Three simple trailhead and parking areas would be developed to stop motorized vehicles from entering the wilderness, to facilitate backcountry access, and to otherwise inform visitors about wilderness use. Signs and markers would also be placed at many points around the boundary.

The remaining 51,740 acres would be open to motorized vehicle use, including the remaining 16 miles of exsiting vehicle routes. The present 50 visitor-days per year of motorized recreation in this portion would slowly increase to a total of 90 visitor-days due to displacement of vehicle use from the designated wilderness portion, to increased demand for access to the wilderness, and due to greater accessibility as a result of new roads constructed for mineral exploration. Six miles of additional primitive vehicle routes would gradually become established by repeated vehicle use where terrain is suitable for it at the southern, northern, and eastern sides of the WSA.

Woodlands Management Actions

Under Partial Wilderness Alternative A, no wood-cutting would be allowed in the 27,860-acre wilderness. About 125 acres of pinyon-juniper woodland would be opened to commercial firewood sales of 500 cords in Section 23 of

T. 10 N., R. 33 E., as the other 275 acres in Section 29 of T. 10 N., R. 34 E. and Section 5 of T. 9 N., R. 34 E. would be unavailable for cutting 1,100 cords within the designated wilderness. Woodcutting of 1,600 cords would no longer be an option in the northernmost 400 acres of the proposed 1,000-acre public non-commercial cutting area, but woodcutting of 2,400 cords could proceed on 600 acres in the Petrified Wash area (Section 23 in T. 9 N., R. 34 E.). No new roads would be constructed, but approximately two miles of vehicle ways would become established in the cutting areas. Some plants would be damaged by motorized vehicle use, but soil erosion would be minimal. No riparian areas would be affected. Cutting areas would be open the year around, but most cutting would occur between April through December at a rate of 60 cords per year. Demand for wood at this location is modest, and wood is readily available elsewhere in the vicinity.

Water and Riparian Resource Management Actions

Six of the nine springs within the WSA would be developed and maintained to protect the sources and associated small riparian sites from trampling and overgrazing by livestock and wild horses and to provide water for wild horses, wildlife, livestock, and humans. Development would entail fence exclosures, spring boxes, water pipes, troughs outside the exclosures for wild horses and livestock, and troughs inside the exclosures for wildlife. Motor vehicle access would be used to inspect and maintain the development at Upper Petrified Spring (on two miles of jeep trail way), at Corral Spring (on one mile of jeep trail way), and Bobcat Spring (on three miles of jeep trail way and two miles of driving through the wash in Paint Rock Canyon). The use of motorized vehicle to maintain Corral Spring when necessary would require special authorization in the wilderness.

Livestock Grazing Management Actions

Livestock grazing management actions would be the same under Partial Wilderness Alternative A as described under the Proposed Action. Livestock use within the WSA would continue to be allotted to one operator within the Pilot Mountain/Table Mountain Allotment. Cattle use of about 4,225 animal unit months of forage per year within the WSA during winter would continue for the forseeable future. No future range improvements are proposed, and none are likely to be needed in the forseeable future.

Wild Horse Management Actions

Under Partial Wilderness Alternative A, wild horses ranging within the Gabbs Valley Range WSA would be managed according to the Pilot Mountain Herd Area Management Plan. Excess animals would accordingly be gathered and removed when necessary to maintain the population within the limits of habitat carrying capacity. The method of capture would be to herd horses by helicopter into temporary corral traps at selected sites easily accessible by

livestock trucks. The WSA would support a maximum of about 400 head, at which point the Bureau would reduce that number to an initial management level of about 150. The use of a helicopter over the wilderness portion of the WSA would have to be specially authorized, but otherwise operations would proceed just as under the Proposed Action. Exclosure fences around small riparian sites at six developed springs would be maintained to protect from trampling and overgrazing by wild horses and livestock.

PARTIAL WILDERNESS ALTERNATIVE B:	68,170 Acres Suitable for Wilderness
(Gabbs Valley Range WSA)	11,430 Acres Nonsuitable for Wilderness

Under Partial Wilderness Alternative B (Map 2, page 2-25), 68,170 acres would be recommended suitable for wilderness. This portion would be managed to preserve wilderness values, and motorized vehicle use, fuelwood harvest, and mineral exploration would be prohibited except where provided for in approved mining plan of operations due to valid existing rights. The rationale for this alternative would be to designate as large an acreage wilderness as feasible by excluding only the areas from the WSA which have been disturbed or are projected to be disturbed by mining due to valid, existing rights even in wilderness. Grazing by wild horses and livestock would continue as at present. The remaining 11,430 acres would be managed for multiple use under the existing Walker Resource Area RMP. The following scenario of expected likely actions is estimated for use in this analysis.

Minerals Management Actions

The 68,170 acres of the WSA designated wilderness would be withdrawn from all forms of mineral entry including mineral leasing. No new claims could be staked. No exploration would be allowed on the 298 claims existing in the wilderness. It is projected that valid, existing rights may be proved at Poinsettia Spring Mine, which therefore would be allowed to proceed as in the Proposed Action. This would result in a projected 40 acres of disturbance inside the wilderness. No other mining would occur in the wilderness, due to the projected absence of any other valid, existing rights.

The remaining 11,430 acres not designated wilderness would be open to mineral entry. The gold-mining operations projected to operate in the vicinity of Petrified Wash and Civit Cat Mine under the Proposed Action would operate unaffected by wilderness designation. Resumption of exploration activities on 198 existing claims would disturb a total of 750 acres at the rate of 15 acres of land surface per year along the southwest portion of the WSA. No riparian areas in the WSA would be affected by these activities, which are further described below.

In the Petrified Wash area at the southern side and entirely within the WSA, one gold-mining company has grandfathered mineral rights and has been conducting an intensive exploration program in protracted sections 22 and 23 of T. 9 N., R. 34 E. It is projected that the firm would prove the ore body which it is attempting to evaluate and would demonstrate valid, existing rights. Development would consist of an open-pit mine impacting about 50 acres at its completion. The disseminated gold ore in an epithermal gold ore deposit is amenable to cyanide heap-leaching, which would be conducted on-site in accordance with applicable state laws, including the requirement to obtain a "zero-discharge" permit from the Nevada Division of Environmental Protection. A system of leach pads and ponds would be constructed in Sections 23 and 24 involving 40 acres. An access road system would be created which, including the two miles of existing roads, would total about 10 miles (average width 30 feet; 36 acres). Office, maintenance shop, laboratory, drill pads and ponds, mine dumps, and four miles of power-line with maintenance roads would account for another 40 acres of disturbance. Nevada Division of Environmental Protection would regulate generation of airborn particulate matter. A total disturbance area of about 170 acres is anticipated on small ridgetops, sideslopes, and in minor ravines within the present boundaries of the WSA.

Another company has for several years been conducting an intensive geophysical exploration and drilling program in the vicinity of Poinsettia Spring Mine at the northern end of the WSA. The firm would be able to prove valid, existing rights and would develop an open-pit gold mine complex extending out of the "cherry-stemmed" exclusion and into the northwestern portion of the WSA. The shallow epithermal gold deposit would be followed in Sections 27, 28, and 34 (T. 11 N., R. 33 E). In all, the pit complex and attendent road network would disturb 100 acres; 40 acres, including 0.7 miles of 60-foot-wide road, would be in low, rolling hills inside the WSA boundaries. An ore-processing facility would be constructed on more favorable terrain northwest of the spring (about three miles west of Superstition Canyon); this facility would be almost entirely on land outside the WSA (5 to 10 acres of WSA impacted). Mine waste dumps in the WSA would impact 20 acres. Nevada Division of Environmental Protection would regulate generation of airborn particulate matter. Altogether, about 70 acres of the WSA would be disturbed by the mining program.

Renewed interest in the currently inactive Civit Cat Mine would lead to expansion of gold mine development beyond the historically mined area in Section 20 of T. 9 N., R. 34 E., and into the WSA in small canyons in Section 17 and Section 21. It is anticipated that, following a showing of valid, existing rights, the disseminated gold ore deposit would be followed into the WSA, where two small open-pit gold mining operations would disturb a total of 60 acres. The pit in Section 17 would occupy 35 acres, and the one in Section 21 would take 25 acres. Three miles of 60-foot-wide haul roads associated with the two pits would add 20 acres of disturbance. Nevada Division of Environmental Protection would regulate generation of airborn particulate matter. Four 2.5-acre waste dumps (two of them for stockpiling overburden for later use in site reclamation), 22 drill pads totalling 5 acres, and four staging areas (10 acres together) would add another 25 acres for a minimum total of 105 acres of disturbance.

Mineral exploration on 198 unpatented claims would result in disturbance of a total of 750 acres at the rate of about 15 acres per year in a two-mile-wide strip along the southwest side, all within the WSA. Exploration activities would entail construction of drill-pads, drilling sumps, small trenches dug by backhoe, larger bulldozed trenches, and six miles of access roads.

Recreation Management Actions

Under Partial Wilderness Alternative B, 68,170 acres would be closed to the use of motorized vehicles. Approximately 20 miles of existing vehicle routes would be closed, eliminating 46 visitor-days per year of motorized recreation. Non-motorized recreation would slowly increase from 14 to 67 visitor-days per year within the 68,170 acres of wilderness as a result of formal wilderness designation and consequent increased public awareness of the area. No new trails would be constructed or needed to facilitate back country travel, but footpaths would become established by repeated use.

Three simple trailhead and parking areas would be developed to stop motorized vehicles from entering the wilderness, to facilitate backcountry access, and to otherwise inform visitors about wilderness use. Signs and markers would be placed at many points around the boundary.

The remaining 11,430 acres would be open to motorized vehicle use, including the remaining two miles of exsiting vehicle routes. The present four visitor-days per year of motorized recreation in this portion would slowly increase to a total of eight visitor-days due to displacement of vehicle use from the designated wilderness portion and to increased demand for access to the wilderness. One mile of additional primitive vehicle routes would gradually become established by repeated vehicle use where terrain is suitable for it at the southern side of the WSA.

Woodlands Management Actions

Under Partial Wilderness Alternative B, all 400 acres of the potential commercial firewood cutting areas and the northernmost 500 acres of the non-commercial cutting area would lie within the 68,170 acres to be designated wilderness. Therefore, those 900 acres would no longer be available for fuelwood harvest. The modest commercial demand for 1,600 cords, and half the non-commercial demand of 400 cords, over the next 50 years would have to be supplied from other sources, which are abundant in the vicinity. The 500-acre public cutting area in the Petrified Wash area (Section 23 in T. 9 N., R. 34 E.) would be half the potential size. No new roads would be constructed, but approximately two miles of vehicle ways would become established in the cutting areas. Some plants would be damaged by motorized vehicle use, but soil erosion would be minimal. No riparian areas would be

affected. The cutting area would be open the year around, but most cutting would occur between April through December at a rate of 60 cords per year. Demand for wood at this location is modest, and wood is readily available elsewhere in the vicinity.

Water and Riparian Management Actions

Six of the nine springs within the WSA would be developed and maintained to protect the sources and associated small riparian sites from trampling and overgrazing by livestock and wild horses and to provide water for wild horses, wildlife, livestock, and humans. Development would entail fence exclosures, spring boxes, water pipes, troughs outside the exclosures for wild horses and livestock, and troughs inside exclosures for wildlife. Motor vehicle access would be used to inspect and maintain the develpment at Upper Petrified Spring (on two miles of jeep trail way), at Corral Spring (on one mile of jeep trail way), and Bobcat Spring (on three miles of jeep trail way and two miles of driving through the wash in Paint Rock Canyon). This use of motor vehicles would be specially authorized when necessary in the wilderness.

Livestock Grazing Management Actions

Livestock grazing management actions would be the same under Partial Wilderness Alternative B as described under the Proposed Action. Livestock use within the WSA would continue to be allotted to one operator within the Pilot Mountain/Table Mountain Allotment. Cattle use of about 4,225 animal unit months of forage per year within the WSA during winter would continue for the forseeable future. No future range improvements are proposed, and none are likely to be needed in the forseeable future.

Wild Horse Management Actions

Under Partial Wilderness Alternative B, wild horses ranging within the Gabbs Valley Range WSA would be managed according to the Pilot Mountain Herd Area Management Plan. Excess animals would accordingly be gathered and removed when necessary to maintain the population within the limits of habitat carrying capacity. The method of capture would be to herd horses by helicopter into temporary corral traps at selected sites easily accessible by livestock trucks. The WSA would support a maximum of about 400 head, at which point the Bureau would reduce that number to an initial management level of about 150. The use of a helicopter over the wilderness portion of the WSA,and the use of livestock trucks over the way in Paint Rock Canyon, would have to be specially authorized, but otherwise operations would proceed just as under the Proposed Action. Exclosure fencing around small riparian sites at six developed springs would be maintained to protect from trampling and overgrazing by wild horses and livestock.

ALL WILDERNESS ALTERNATIVE:	79,600 Acres Suitable for Wilderness
(Gabbs Valley Range WSA)	0 Acres Nonsuitable for Wilderness

All 79,600 acres would be designated wilderness (Map 2, page 2-25), and motorized vehicles and mineral activity would be prohibited except where valid existing rights can be proven. Grazing by wild horses and livestock would continue as at present. The following scenario of expected likely actions is estimated for use in this analysis.

Minerals/Energy Management Actions

The 79,600-acre wilderness would be withdrawn from all forms of mineral entry including mineral leasing. The development of three open-pit gold mines would still result from the determination of valid existing rights, as projected under the Proposed Action. Roughly 340 acres of the surface in the wilderness would be thereby impacted. The mines would not affect any riparian areas in the WSA. No surface-disturbing exploration would be allowed on the 496 existing claims, and there would be no opportunity to stake any new claims.

In the Petrified Wash area at the southern side and entirely within the WSA, one gold-mining company has grandfathered mineral rights and has been conducting an intensive exploration program in protracted sections 22 and 23 of T. 9 N., R. 34 E. It is projected that the firm would prove the ore body which it is attempting to evaluate and would demonstrate valid, existing rights. Development would consist of an open-pit mine impacting about 50 acres at its completion. The disseminated gold ore in an epithermal gold ore deposit is amenable to cyanide heap-leaching, which would be conducted on-site in accordance with applicable state laws, including the requirement to obtain a "zero-discharge" permit from Nevada Division of Environmental Protection. A system of leach pads and ponds would be constructed in Sections 23 and 24 involving 40 acres. An access road system would be created which, including the two miles of existing roads, would total about 10 miles (average width 30 feet; 36 acres). Office, maintenance shop, laboratory, drill pads and ponds, mine dumps, and four miles of power-line with maintenance roads would account for another 40 acres of disturbance. Nevada Division of Environmental Protection would regulate generation of airborn particulate matter. A total disturbance area of about 170 acres is anticipated on small ridgetops, sideslopes, and in minor ravines within the present boundaries of the WSA.

Another company has for several years been conducting an intensive geophysical exploration and drilling program in the vicinity of Poinsettia Spring Mine at the northern end of the WSA. It is projected that the firm may be able to prove valid, existing rights and would develop an open-pit gold mine complex extending out of the "cherry-stemmed" exclusion and into the northwestern portion of the WSA. The shallow epithermal gold deposit would be followed in Sections 27, 28, and 34 (T. 11 N., R. 33 E). In all, the pit complex and attendent road network would disturb 100 acres; 40 acres, including 0.7 miles

of 60-foot-wide road, would be in low, rolling hills inside the WSA boundaries. An ore-processing facility would be constructed on more favorable terrain northwest of the spring (about three miles west of Superstition Canyon); this facility would be almost entirely on land outside the WSA (5 to 10 acres of WSA impacted). Mine waste dumps in the WSA would impact 20 acres. Nevada Division of Environmental Protection would regulate generation of airborn particulate matter. Altogether, about 70 acres of the WSA would be disturbed by the mining program.

Renewed interest in the currently inactive Civit Cat Mine would lead to expansion of gold mine development beyond the historically mined area in Section 20 of T. 9 N., R. 34 E., and into the WSA in small canyons in Section 17 and Section 21. It is anticipated that, following a showing of valid, existing rights, the disseminated gold ore deposit would be followed into the WSA, where two small open-pit gold mining operations would disturb a total of 60 acres. The pit in Section 17 would occupy 35 acres, and the one in Section 21 would take 25 acres. Three miles of 60-foot-wide haul roads associated with the two pits would add 20 acres of disturbance. Nevada Division of Environmental Protection would regulate generation of airborn particulate matter. Four 2.5-acre waste dumps (two of them for stockpiling overburden for later use in site reclamation), 22 drill pads totalling 5 acres, and four staging areas (10 acres together) would add another 25 acres for a minimum total of 105 acres of disturbance.

Recreation Management Actions

Under the All Wilderness Alternative, 79,600 acres would be closed to the use of motorized vehicles. Approximately 22 miles of existing vehicle routes would be closed, eliminating 62 visitor-days per year of motorized recreation. Non-motorized recreation would slowly increase from 16 to 67 visitor-days per year. No new trails would be constructed or needed to facilitate back country travel, but footpaths would probably become established by repeated use.

Three simple trailhead and parking areas would be developed to stop motorized vehicles from entering the wilderness, to facilitate backcountry access, and to inform visitors about wilderness use. Signs and markers would be placed at many points around the boundary.

Woodlands Management Actions

Under the All Wilderness Alternative, all 400 acres of the potential commercial firewood cutting areas and the 1000-acre noncommercial cutting area would lie within the 79,600 acres to be designated wilderness. Therefore, those areas would no longer be available for use as cutting areas. The modest commercial demand for 1,600 cords and the 4,000-cord non-commercial demand over the next 50 years would have to be supplied from other sources, which are abundant in the vicinity.

Water and Riparian Management Actions

Six of the nine springs within the WSA would be developed and maintained to protect the sources and associated small riparian sites from trampling and overgrazing by livestock and wild horses and to provide water for wild horses, wildlife, livestock, and humans. Development would entail fence exclosures, spring boxes, water pipe, troughs outside the exclosures for wild horses and livestock, and troughs inside exclosures for wildlife. Motor vehicle access would be used to inspect and maintan the develpment at Upper Petrified Spring (on two miles of vehicle way), at Corral Spring (on one mile of way), and Bobcat Spring (on three miles of way and two miles of driving through the wash in Paint Rock Canyon). This use of motor vehicles would be specially authorized when necessary in the wilderness.

Livestock Grazing Management Actions

Livestock grazing management actions would be the same under the All Wilderness Alternative as described under the Proposed Action. Livestock use within the WSA would continue to be allotted to one operator within the Pilot Mountain/Table Mountain Allotment. Cattle use of about 4,225 animal unit months of forage per year within the WSA during winter would continue for the forseeable future. No future range improvements are proposed, and none are likely to be needed in the forseeable future.

Wild Horse Management Actions

Wild horse management actions would be the same for the All Wilderness Alternative as described under the Proposed Action. Wild horses ranging within the Gabbs Valley Range WSA would be managed according to the Pilot Mountain Herd Area Management Plan. Excess animals would accordingly be gathered and removed when necessary to maintain the population within the limits of habitat carrying capacity. The method of capture would be to herd horses by helicopter into temporary corral traps at selected sites easily accessible by livestock trucks. The WSA would support a maximum of about 400 head, at which point the Bureau would reduce that number to an initial management level of about 150. The use of a helicopter over the wilderness portion of the WSA, and the use of livestock trucks on the way in Paint Rock Canyon and Petrified Wash, would have to be specially authorized, but otherwise operations would proceed just as under the Proposed Action. Exclosure fences around small riparian sites at six developed springs would be maintained to protect from trampling and overgrazing by wild horses and livestock and provide water for them.

BURBANK CANYONS WSA

(NV-030-525a)

PROPOSED ACTION (NO WILDERNESS) 0 Acres Suitable for Wilderness
13,395 Acres Nonsuitable for Wilderness

Under the Proposed Action (Map 6, page 2-26), none of the 13,395 acres would be designated wilderness. All would be managed for multiple uses under the guidance of the BLM's Walker Resource Management Plan, except that motorized vehicle use would not be allowed except in emergencies, for specific administrative needs, or when approved under a mining plan of operation. The entire WSA is already designated and managed as a scenic area, which means the Bureau would not allow discretionary actions--such as land sales, powerline or road construction, mineral leases and sales, and geothermal leases--which would not be compatible with the scenic resources there. Mineral entry and development would still be allowed. Grazing by livestock would continue at present levels. The following scenario of expected likely actions is estimated for use in this analysis.

Minerals Management Actions

Under the Proposed Action, the entire area would remain open to mineral entry. Three moderate-sized gold mines would be developed and expanded within the present WSA boundaries and result in an additional 300 acres of surface disturbance on the periphery of the area. Exploration on 47 existing unpatented claims would disturb a total of 500 acres at the rate of about 10 acres per year along the northern edge of the WSA in the basin of Red Canyon. Exploration activities would include construction of drill-pads, drilling sumps, small trenches dug by backhoe, larger bull-dozed trenches and four miles of access road each year. Increased sedimentation and loss of four acres of riparian vegetation would occur along Red Canyon Creek, which flows immediately adjacent to the northern WSA boundary road. Prospectors would have the opportunity to stake and work new claims.

To date, the Premier Mine in Section 15 of T. 11 N., R. 22 E., has remained an essentially underground operation whose surface manifestations include access roads, mine dumps, and pads for equipment and supplies. With projected increase in the prices of gold and silver, it is anticipated that the on-going but sporadic mining development would intensify and become a routine, day-to-day operation. Development would include creation of a 40-acre mill facility north of the mine, expansion of existing access roads between adits to a total of one mile, and creation of a suitable haul/access road from the mine through Red Canyon. The latter road alignment would be approximately six and a half miles long, including three miles of existing road which would be upgraded on the WSA's northwest border. It is estimated that the new and upgraded segments of the road would be 30 feet in width, yielding an additional disturbance of 20 acres. Nevada Division of Environmental Protection

would regulate generation of airborn particulate matter. Increased stream sedimentation and loss of an additional acre of riparian vegetation would occur along the upgraded road that presently lies adjacent to Red Canyon Creek. Ancillary facilities (including powder magazines and expanded mine dumps) would add an additional but presently indeterminate acreage to the disturbance. A gross, long-term estimate of 100 acres of new disturbance is projected.

It is projected that the corporation which has acquired the patented mining claim(s) at the San Juan/El Capitan Mine in Section 19 and 20 (T. 11 N., R. 23 E.) would develop adjacent, unpatented mining claims. An open-pit mine would be developed north of the patented property, disturbing 70 acres in aggregate. A cyanide heap-leach facility would be created on amenable topography in Section 19 in accordance with applicable state laws, including the requirement to obtain a "zero-discharge" permit from Nevada Division of Enviornmental Protection, disturbing 25 acres. A mile-long haulroad leading from the mining/processing operations south to the existing road in Wedertz and Rickey Canyons would be constructed, disturbing approximately five additional acres. Nevada Division of Environmental Protection would regulate generation of airborn particulate matter. Total estimated disturbance would be 100 acres. No riparian areas would be affected.

Operations on the patented property in Section 16 (T. 11 N., R. 23 E.) are expected to expand onto adjacent public lands. Development to date has been underground, and it is believed that this method of mining would continue. Expansion of the mining effort would create about two miles of new project road (10 acres). Because of the rugged topography, mine dumps would tend to quickly migrate downslope into Little Burbank Canyon and down the east-facing slope of the Pine Nut Range where the sidecast material would be highly visible. These dumps (two anticipated) would cover 50 acres. Because the cost to construct an ore-processing facility on the steep hillsides would be prohibitive, it is projected that the ore would be hauled to the mill near the Buckskin Mine in upper Smith Valley. A substantial haul road would be constructed from the subject mine southeasterly down to the Upper Colony Road. It is estimated that 10 acres of surface disturbance would result from this road construction, coupled with a bank of highly visible sidecast material along the downslope shoulder of the road (30 acres). Nevada Division of Environmental Protection would regulate generation of airborn particulate matter. Total estimated disturbance would be 100 acres in the WSA. No riparian areas would be affected.

The cumulative total surface disturbance by application for and development of mineral resources would be 800 acres.

Recreation Management Actions

Under the Proposed Action, all 13,395 acres would be designated closed to the use of motorized vehicles to protect scenic values. The entire WSA would be

administratively designated a "scenic area" and shown on public maps as such to inform the public of the scenic resource. This designation does not mandate as strong protection as wilderness designation would provide, but it serves to alert Bureau managers that the scenic values are significant and should be managed accordingly. Recreation would include hunting for deer and upland game, fishing, hiking, camping, and sightseeing. Motorized recreation is nearly non-existent. The current estimated 97 visitor-days of recreation annually would increase to 157 visitor-days per year due to scenic area designation. Two trailhead parking areas would be developed to prevent motor vehicle entry and to inform visitors about the area.

Livestock Grazing Management Actions

Under the Proposed Action, livestock use within the WSA would continue to be allotted to two operators within the Red Burbank and Spring Gulch Allotments. Cattle would use 120 animal unit months in the Red Burbank Allotment, which includes primarily the canyon bottoms. Most of the 1,110 AUMs which sheep would use in the Spring Gulch Allotment would be at the higher elevations along the west side of the WSA. No range improvements exist, and none would be proposed. Grazing has not caused deterioration of the riparian areas in Burbank and Red Canyons and is not expected to in the future.

PARTIAL WILDERNESS ALTERNATIVE:	9,970 Acres Suitable for Wilderness
(Burbank Canyons WSA)	3,425 Acres Nonsuitable for Wilderness

Under the Partial Wilderness Alternative (Map 6, page 2-26), 9,970 acres would be designated wilderness. This portion would be managed to preserve wilderness values, and motorized vehicles and mineral activity would be prohibited except where valid existing rights can be proven and a plan of mining operation (including justification for vehicle use) approved. Grazing by livestock would continue as at present. The remaining 3,425 acres would be managed for multiple use but would also be closed to motorized vehicle use except for emergencies and specific administrative needs. The following scenario of expected likely actions is estimated for use in this analysis.

Minerals/Energy Management Actions

The 9,970 acres of the WSA designated wilderness would be withdrawn from all forms of mineral entry including mineral leasing. No mining or exploration would be allowed to occur in the wilderness, although mining under valid, existing rights would proceed. No new claims would be staked.

The remaining 3,425 acres not designated wilderness would be open to mineral entry and development. Most exploration would occur in the northwest side of the WSA above the north and south forks of Red Canyon. Exploration activities would include construction of drill-pads, drilling sumps, small trenches dug

by backhoe, larger bull-dozed trenches, and two miles of road each year (100 miles total), disturbing a total of five acres per year (250 acres total). A slight increase in sedimentation and the loss of one acre of riparian vegetation would result along the headwaters of Red Canyon Creek. Prospectors would have the opportunity to stake and work new claims. All three mining operations and the geothermal development projected to occur under the Proposed Action would still occur in the same way under the Partial Wilderness Alternative outside the designated wilderness as described below.

To date, the Premier Mine in Section 15 of T. 11 N., R. 22 E., has remained an essentially underground operation whose surface manifestations include access roads, mine dumps, and pads for equipment and supplies. With the projected increase in the prices of gold and silver, it is anticipated that the on-going but sporadic mining development would intensify and become a routine, day-to-day operation. Development based on valid, existing rights would include creation of a 40-acre mill facility north of the mine, expansion of existing access roads between adits to a total of one mile, and creation of a suitable haul/access road from the mine through Red Canyon. The latter road alignment would be approximately six and a half miles long, including three miles of existing road which would be upgraded on the WSA's northwest border. It is estimated that the new and upgraded segments of the road would be 30 feet in width, yielding an additional disturbance of 20 acres. Increased sedimentation and loss of an additional acre of riparian vegetation would occur along the upgraded road that presently lies adjacent to Red Canyon Creek. Ancillary facilities (including powder magazines and expanded mine dumps) would add an additional but presently indeterminate acreage to the disturbance. Nevada Division of Environmental Protection would regulate generation of airborn particulate matter. A gross, long-term estimate of 100 acres of new disturbance is projected.

It is projected that the corporation which has acquired the patented mining claim(s) at the San Juan/El Capitan Mine in Section 19 and 20 (T. 11 N., R. 23 E.) would prove to have valid, existing rights on adjacent, unpatented mining claims. An open-pit mine would be developed north of the patented property, disturbing 70 acres in aggregate. A cyanide heap-leach facility would be created on amenable topography in Section 19 in accordance with applicable state laws, including the requirement to obtain a "zero-discharge" permit from Nevada Division of Environmental Protection. A mile-long acceptable haulroad leading from the mining/processing operations south to the existing road in Wedertz and Rickey Canyons would be constructed, disturbing approximately five additional acres. Nevada Division of Environmental Protection would regulate generation of airborn particulate matter. Total estimated disturbance would be 100 acres. No riparian areas would be affected.

Operations on the patented property in Section 16 (T. 11 N., R. 23 E.) are expected to expand onto adjacent public lands based on valid, existing rights. Development to date has been underground, and it is believed that this method of mining would continue. Expansion of the mining effort would

create about two miles of new project road (10 acres). Because of the rugged topography, mine dumps would tend to quickly migrate downslope into Little Burbank Canyon and down the east-facing slope of the Pine Nut Range where the sidecast material would be highly visible. These dumps (two anticipated) would cover 50 acres. Because the cost to construct an ore-processing facility on the steep hillsides would be prohibitive, it is projected that the ore would be hauled to the mill near the Buckskin Mine in upper Smith Valley. A substantial haul road would be constructed from the subject mine southeasterly down to the Upper Colony Road. It is estimated that 10 acres of surface disturbance would result from this road construction, coupled with a bank of highly visible sidecast material along the downslope shoulder of the road (30 acres). Nevada Division of Environmental Protection would regulate generation of airborn particulate matter. Total estimated disturbance would be 100 acres in the WSA. No riparian areas would be affected.

The cumultative total surface disturbed by application and development of mineral resources would be 550 acres.

Recreation Management Actions

Under the Partial Wilderness Alternative, all 9,970 acres would be designated closed to the use of motorized vehicles due to wilderness designation and to protect scenic values. The entire WSA would be designated a wilderness and shown on public maps as such to inform the public of the recreational opportunity. Recreation comprises hunting for deer and upland game, fishing, hiking, camping, and sightseeing. Motorized recreation would be non-existent. The current estimated 97 visitor-days of non-motorized recreation annually would increase to 200 visitor-days per year due to wilderness area designation. Two trailhead parking areas would be developed to prevent motor vehicle entry, to facilitate backcountry access, and to inform visitors about the wilderness.

Livestock Grazing Management Actions

Livestock grazing management actions under the Partial Wilderness Alternative would be the same as under the Proposed Action. Livestock use within the WSA would continue to be allotted to two operators within the Red Burbank and Spring Gulch Allotments. Cattle would use 120 animal unit months in the Red Burbank Allotment, which includes primarily the canyon bottoms. Most of the 1,110 AUMs which sheep would use in the Spring Gulch Allotment would be at the higher elevations along the west side of the WSA. No range improvements exist, and none would be proposed. Grazing has not caused deterioration of the riparian areas in Red and Burbank Canyons and is not expected to in the future.

ALL WILDERNESS ALTERNATIVE: 13,395 Acres Suitable for Wilderness
(Burbank Canyons WSA) 0 Acres Nonsuitable for Wilderness

Under the All Wilderness Alternative (Map 6, page 2-26), 13,395 acres would be designated wilderness, and motorized vehicles and mineral activity would be prohibited except where authorized under an approved mining plan of operations due to valid existing rights. Grazing by livestock would continue as at present. The following scenario of expected likely actions is estimated for use in this analysis.

Minerals/Energy Management Actions

Under the All Wilderness Alternative, all 13,395 acres of the WSA would be withdrawn from all forms of mineral entry including mineral leasing. No new claims nor exploration would be allowed on the 47 existing claims. However, all three mining operations and the geothermal development projected to occur under the Proposed Action would still occur in the wilderness in the same way under the All Wilderness Alternative, because valid, existing rights are projected to be proven for each after the filing of plans of operation.

To date, the Premier Mine in Section 15 of T. 11 N., R. 22 E., has remained an essentially underground operation whose surface manifestations include access roads, mine dumps, and pads for equipment and supplies. With the projected increase in the prices of gold and silver, it is anticipated that the on-going but sporadic mining development would intensify and become a routine, day-to-day operation based on valid, existing rights. Development would include creation of a 40-acre mill facility north of the mine, expansion of existing access roads between adits to a total of one mile, and creation of a suitable haul/access road from the mine through Red Canyon. The latter road alignment would be approximately six and a half miles long, including three miles of existing road which would be upgraded on the WSA's northwest border. It is estimated that the new and upgraded segments of the road would be 30 feet in width, yielding an additional disturbance of 20 acres. Increased sedimentation and loss of one acre of riparian vegetation would occur along the upgraded road that presently lies adjacent to Red Canyon Creek. Ancillary facilities (including powder magazines and expanded mine dumps) would add an additional but presently indeterminate acreage to the disturbance. Nevada Division of Environmental Protection would regulate generation of airborn particulate matter. A gross, long-term estimate of 100 acres of new disturbance is projected.

It is projected that the corporation which has acquired the patented mining claims at the San Juan/El Capitan Mine in Section 19 and 20 (T. 11 N., R. 23 E.) would prove to have valid, existing rights on adjacent, unpatented mining claims. An open-pit mine would be developed north of the patented property, disturbing 70 acres in aggregate. A cyanide heap-leach facility would be created on amenable topography in Section 19 in accordance with

applicable state laws, including the requirement to obtain a "zero-discharge" permit from the Nevada Division of Environmental Protection, disturbing 25 acres. A mile-long acceptable haulroad leading from the mining/processing operations south to the existing road in Wedertz and Rickey Canyons would be constructed, disturbing approximately five additional acres. Nevada Division of Environmental Protection would regulate generation of airborn particulate matter. Total estimated disturbance would be 100 acres. No riparian areas would be affected.

Operations on the patented property in Section 16 (T. 11 N., R. 23 E.) are expected to expand onto adjacent public lands based on a demonstration of valid, existing rights. Development to date has been underground, and it is believed that this method of mining would continue. Expansion of the mining effort would create about two miles of new project road (10 acres). Because of the rugged topography, mine dumps would tend to quickly migrate downslope into Little Burbank Canyon and down the east-facing slope of the Pine Nut Range where the sidecast material would be highly visible. These dumps (two anticipated) would cover 50 acres. Because the cost to construct an ore-processing facility on the steep hillsides would be prohibitive, it is projected that the ore would be hauled to the mill near the Buckskin Mine in upper Smith Valley. A substantial haul road would be constructed from the subject mine southeasterly down to the Upper Colony Road. It is estimated that 10 acres of surface disturbance would result from this road construction, coupled with a bank of highly visible sidecast material along the downslope shoulder of the road (30 acres). Nevada Division of Environmental Protection would regulate generation of airborn particulate matter. Total estimated disturbance would be 100 acres in the WSA. No riparian areas would be affected.

The cumulative total surface disturbed by development of minerals and energy resources would be 300 acres.

Recreation Management Actions

Under the All Wilderness Alternative, all 13,395 acres would be designated closed to the use of motorized vehicles due to wilderness designation. The entire WSA would be shown on public maps as wilderness to inform the public of the recreational opportunity. Recreation includes hunting for deer and upland game, fishing, hiking, camping, and sightseeing. Motorized recreation would be non-existent. The current estimated 97 visitor-days of non-motorized recreation annually would increase to 200 visitor-days per year due to wilderness area designation. Two trailhead parking areas would be developed to prevent motor vehicle entry, to facilitate backcountry access, and to inform visitors about the wilderness.

Livestock Grazing Management Actions

Livestock grazing management actions would be the same for the All Wilderness Alternative as described under the Proposed Action. Livestock use within the WSA would continue to be allotted to two operators within the Red Burbank andSpring Gulch Allotments. Cattle would use 120 animal unit months in the Red Burbank Allotment, which includes primarily the canyon bottoms. Most of the 1,110 AUMs which sheep would use in the Spring Gulch Allotment would be at the higher elevations along the west side of the WSA. No range improvements exist, and none would be proposed. Grazing has not caused deterioration of the riparian areas in Burbank and Red Canyons and is not expected to in the future.

Table 2

Comparison of Impacts of the Proposed Action and Alternatives

Gabbs Valley Range WSA

Environmental Issue	Proposed Action (No Wilderness)	Partial Wilderness Alternative A	Partial Wilderness Alternative B	All Wilderness Alternative
Impacts on Wilderness Values	Mineral exploration activities would substantially diminish opportunities for solitude and primitive recreation in the area's most visually diverse and isolated section on the northeast side of Mount Ferguson in the basin of Redrock Canyon. Riparian sites would not be affected. Elsewhere in the WSA, where wilderness values are lower, mineral exploration, mining, fuelwood harvest, and motorized recreation would cause minor impacts to wilderness values overall, mainly due to a net reduction of the size of the area which would remain primarily natural in appearance by about 4,000 acres.	Wilderness designation on 27,860 acres would preserve the area's best opportunities for solitude and primitive recreation centered around the most prominent and diverse features, including Redrock Canyon and Mount Ferguson. Elsewhere in the WSA, where these wilderness values are lower, mineral exploration, mining, fuelwood harvest, and motorized recreation would cause minor impacts to wilderness values overall, mainly due to a net reduction of the size of the area which would remain primarily natural in appearance by 2,945 acres. No riparian sites would be affected.	Wilderness designation on 68,170 acres would preserve the area's overall natural condition and the best opportunities for solitude and prmitive recreation. Legal protection would be afforded for the prominent features of Mount Ferguson and Redrock Canyon, along with Paint Rock Canyon and the moderately dissected desert landscapes on the northern side of the WSA. In the remaining 11,430 acres where these wilderness values are lower, mineral exploration, mining, fuelwood harvest, and motorized recreation would cause minor impacts to wilderness values overall, mainly due to a net reduction by about 1600 acres in the area which would remain primarily natural in appearance. Riparian sites would not be affected.	Wilderness designation on 68,170 acres would preserve the area's overall natural condition and the best opportunities for solitude and primitive recreation. Legal protection would be afforded for the prominent features of Mount Ferguson and Redrock Canyon, along with Paint Rock Canyon and the moderately dissected desert landscapes on the northern side of the WSA. The only reduction in wilderness values would be due to the operation of three open pit mines which would be able to proceed on the basis of valid, existing rights, disturbing a total of 345 acres. No riparian sites would be affected.

Table 2 (cont.)

Environmental Issue	Proposed Action (No Wilderness)	Partial Wilderness Alternative A	Partial Wilderness Alternative B	All Wilderness Alternative
Impacts on Mineral Development	There would be no impact on exploration for or development of mineral resources.	Wilderness designation would prevent mineral exploration on 27,860 acres and 50 mining claims. There would be no impact on exploration for or the development of mineral resources in the remaining 51,740 acres and 446 claims. Three open-pit mining operations would proceed.	Wilderness designation would prevent mineral exploration on 68,170 acres and 298 mining claims. There would be no impact on exploration for or the development of mineral resources in the remaining 11,430 acres and 198 claims. Three open-pit mines would operate.	Wilderness designation would prevent mineral exploration on 79,600 acres and 496 mining claims. Three open-pit gold-mining operations would proceed.
Impacts on Motorized Recreation	There would be no impact on motorized recreation.	Designation on 27,860 acres would reduce motorized recreation there by 12 visitor-days and cause it to increase slightly in the rest of the WSA.	Designation of 68,170 acres would reduce motorized recreation in most of the WSA by 46 visitor-days.	Designation of 79,600 acres would preclude 62 visitor-days of motorized recreation and any increase.
Impacts on Fuelwood Harvest	There would be no impact on the harvest of fuelwood.	Wilderness designation would reduce the harvest of fuelwood by 2,700 cords, which would be supplied by other local sources.	Wilderness designation would cause a reduction in the fuelwood harvest by 3,600 cords, which would be supplied by other local sources.	Wilderness designation would prevent the harvest of a potential 5,600 cords of fuelwood from the WSA. Local demand would still be supplied from other local sources.

Table 3

Comparison of Impacts of the Proposed Action and Alternatives

Burbank Canyons WSA

Environmental Issue	Proposed Action (No Wilderness)	Partial Wilderness Alternative	All Wilderness Alternative
Impacts on Wilderness Values	Mineral exploration and three gold-mining operations would disturb the wilderness values of naturalness and the opportunity for solitude in a total of 800 acres on all four sides of the WSA's periphery. Five acres of riparian area would be lost from the ecosystem. The area's best opportunities for solitude and primitive recreation--found in Burbank Canyon and characterized by steep canyons with riparian bottoms--would not be affected, because the anticipated disturbances would be screened from perception by the ridges surrounding the canyon.	Wilderness designation would preserve the area's best opportunities for solitude and primitive recreation in Burbank Canyon, which is characterized by steep canyons with riparian bottoms. The three gold-mining operations and limited exploration would eliminate the wilderness values of naturalness and any opportunity for solitude in a total of 550 acres on three sides of the WSA's periphery. Five acres of riparian vegetation would be lost from the ecosystem. The anticipated disturbances would be screened from perception in the wilderness by the ridges surrounding the canyon.	Wilderness designation on would preserve the area's best opportunities for solitude and primitive recreation in Burbank Canyon, which is charaterized by steep canyons with riparian bottoms. Three gold-mining operations would eliminate the wilderness values of naturalness and the opportunity for solitude in a total of 300 acres on three sides of the WSA's periphery. One acre of riparian vegetation would be lost from the ecosystem. The projected disturbances would be screened from perception in the wilderness by the ridges surrounding the canyon.
Impacts on Development of Mineral Resources	There would be no impact on exploration for or development of mineral resources.	Wilderness designation on 9,970 acres would prevent mineral exploration in that area. Exploration could proceed in the remaining area. Three gold-mining operations would proceed.	Wilderness designation on all 13,395 acres would prevent all exploration for minerals. Three gold-mining operations would proceed on the basis of valid, existing rights.

LEGEND

PARTIAL WILDERNESS ALTERNATIVE A

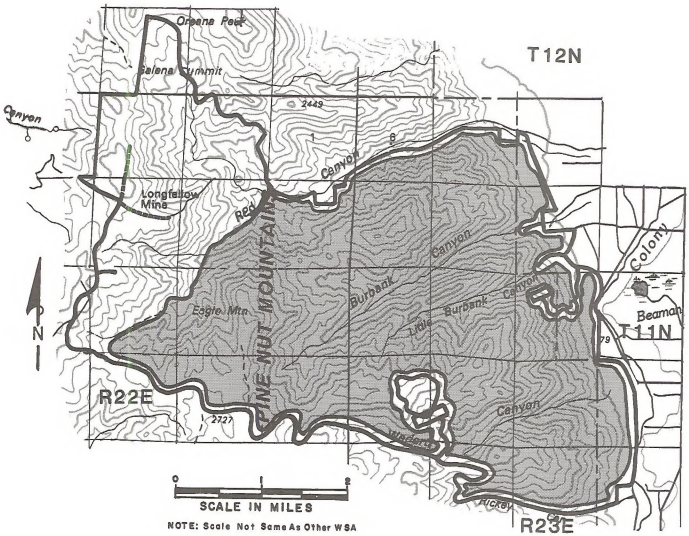
PARTIAL WILDERNESS ALTERNATIVE B

WSA BOUNDARY

PROPOSED ACTION AND ALTERNATIVES

GABBS VALLEY RANGE NV-030-407

MAP 2



LEGEND

PARTIAL WILDERNESS ALTERNATIVE

WSA BOUNDARY

PROPOSED ACTION AND ALTERNATIVES

BURBANK CANYONS NV-030-525A

MAP 6

CHAPTER THREE

AFFECTED ENVIRONMENT

CHAPTER 3

THE AFFECTED ENVIRONMENT

This chapter includes a brief description of each WSA and the resources that could be affected by the management actions of the Proposed Action and the alternatives.

More detailed descriptions of the resources in the study area and the regional socioeconomic conditions may be found in the planning documents for the area. Copies of these documents may be reviewed in the Carson City District Office.

GABBS VALLEY RANGE WSA
(NV-030-407)

The Gabbs Valley Range Wilderness Study Area is located in Mineral County, Nevada, 30 miles east of Hawthorne on Highway 95, 20 miles southwest of Gabbs, and a four-hour drive southeast of Reno. The area contains 79,600 acres of public lands and averages 16 miles in length from north to south and 15 miles in width from east to west (Map 3, page 3-11). The terrain includes a mountain range of hills and rocky ridges, dissected by canyons, and portions of adjacent outwash plains. Vegetation types include greasewood and shadscale (desert shrubs) and sagebrush, pinyon pine, and juniper at higher elevations. Riparian vegetation is found at very small sites associated with five of the nine springs scattered within the WSA. Fifteen additional springs occur around the edges but outside the WSA.

Boundaries of the WSA are formed primarily by roads on all sides but also by private land boundaries and mining-related surface disturbance.

An alluvial wash in Paint Rock Canyon flows eastward into Gabbs Valley (elevation 5,000 feet and below) and roughly bisects the area. The highest elevations in the WSA are in the southern end along a forested ridge, the highest point of which is Mt. Ferguson (8,406 feet). Between Mount Ferguson and Paint Rock Canyon lies the secluded basin of Redrock Canyon. Lesser groups of hills lie to the north of Paint Rock Canyon and on the east side around Gabbs Mountain (6,249 feet).

Most of the WSA appears generally to have been affected primarily by the forces of nature, although mineral exploration and mining activities have disturbed several sites within and adjacent to the boundary.

WILDERNESS VALUES

- Naturalness

  The area is generally free from the appearance of human imprints and is in an apparently natural state. The most apparent imprints of man are

22 miles of vehicle ways, ten miles of roads, six spring developments, three borrow pits on the periphery, and evidence of mining and mineral exploration in the northern and southern ends of the WSA. Similar disturbances have been excluded from the WSA by "cherrystemming", but they are very near the WSA. Still, the area is large enough that in many places the intrusions to naturalness are not apparent. The Bureau is rehabilitating vehicle way W-29 (Map 3, page 3-11), which was rough-graded in trespass in Redrock Canyon. Most of the way lies in an alluvial wash. For the purposes of analysis and decision-making, this way is considered to be non-existent.

- Opportunity for Solitude

Topographic screening varies from negligible, in the flat areas around the eastern and northern edges, to good in the canyons in most of the WSA. Pinyon pine and juniper covers about 11 percent of the WSA in the southern portion of the WSA and provides additional screening. U.S. Air Force pilots occasionally fly fighter jets fast and low over the general area which includes the Gabbs Valley Range WSA. The surprise factor and noise of such overflights do have an adverse effect on one's feeling of solitude, but the flights are so infrequent over the WSA that the opportunity for solitude is degraded but slightly. The best opportunity for solitude is found in the secluded basin of Redrock Canyon.

- Opportunity for Primitive and Unconfined Recreation

Although access is good to any part of the WSA, there are only a few points of interest to attract a visitor. The northern half contains interesting badlands scenery. Higher elevations, tree cover, and springs make for still more pleasant and attractive scenery in the southern half around Paint Rock Canyon and in the basin of Redrock Canyon north of Mt. Ferguson. Elements of challenge are offered by the typical Great Basin climate (i.e., hot, dry summers and cold winters), the somewhat rugged terrain, and the limited sources of water found in the area.

Opportunities are good for hiking and horseback riding for the day or overnight. Recreational opportunities are not especially diverse, but travel by foot and horseback is fairly easy throughout the area without the need for constructed trails. The best opportunity is in the basin of Redrock Canyon, due to visually appealing landscape and McGregor Spring.

- Special Features

An estimated 200 wild horses inhabit most of the study area, which adds another element of interest.

MINERAL AND ENERGY VALUES

The Gabbs Valley Mountain Range WSA is a fault-bounded block composed mainly of felsic and intermediate Tertiary volcanic rocks which blanket any older rocks and mask older structures. Northwest-trending Basin and Range normal faults of Late Tertiary-Early Quaternary time cut through the WSA.

Anomalous mercury levels in Tertiary volcanics in the northwestern portion of the WSA suggest an epithermal gold-silver deposit similar to that of the Bovard mining district a few miles northwest of the WSA. Nothing is known of the geological features that encouraged the dense claim staking in the southern part of the WSA, except for recent work done there by Ventures West Minerals, Ltd. The results of that firm's study suggests the presence of disseminated gold-silver deposits as well as epithermal gold deposits.

Two types of non-metallic deposits--diatomite and sand and gravel--are believed to lie within or near the WSA's boundaries. The diatomite appears to be associated with sediments in the Quaternary-Tertiary mafic rock delineations in the northeastern part of the WSA. Aside from one identified prospect (moderate favorability), the favorability for diatomite in the WSA is low. Sand and gravel deposits would logically be included in the large Quaternary alluvium unit within the north and east boundaries. No development of commercial sand and gravel has taken place in the WSA, although there are three Nevada Department of Transportation material sites nearby. One of these appears to lie partially within the eastern boundary of the WSA. Favorability for sand and gravel is moderate in the Quaternary alluvium unit and low elsewhere in the WSA.

The potential for development of a geothermal resource appears greatest in the northeastern portion of the WSA. Here the alluvium and underlying Cenozoic volcanics are cut by at least one major Basin and Range fault. Four geothermal leases have been issued for an area northeast of the subject lands. Finally, Wedell Springs and Dead Horse Wells are fairly close to this portion of the WSA. Wedell Springs has a temperature of 144 degrees Fahrenheit. Based on the foregoing, the favorability of the northeastern portion of the WSA is moderate for geothermal resources; the balance of the WSA has low favorability (Map 5, page 3-13).

The thin Cenozoic valley deposits and the thick section of Tertiary volcanics probably overlie non-petroliferous rocks found outcropping outside the WSA. These latter Triassic and Jurassic metavolcanics and metasediments, along with Cretaceous granitic intrusives, do not encourage serious petroleum exploration and no wells have been drilled in the WSA. Four oil and gas leases have been issued in an area a few miles northeast of the WSA; however, the entire WSA is classed as unfavorable for oil and gas resources.

There are no active mines in the WSA, but there are a number of prospects and 496 unpatented mining claims.

Twenty-seven percent of the WSA has moderate favorability for the occurrence of metallic minerals, and at least the southern portion is being actively explored. Significant mining operations are being developed near the WSA's southeastern and southwestern boundaries (Map 4, page 3-12).

The entire WSA has moderate to low favorability for occurrence of non-metallic minerals (principally diatomite and sand/gravel deposits). It also has a moderate to low favorability for geothermal resources, but there are no leases within or adjacent to the WSA's boundaries.

The WSA has a low favorability for uranium deposits, and it is not favorable for oil and gas. There are no leases in or adjacent to the WSA.

There is the possibility for occurrence within the WSA of copper and tungsten, which are critical and strategic metals.

RIPARIAN SITES AND SPRINGS

Five of the nine springs found within the WSA support small riparian sites: Upper Petrified Spring, Corral Spring, Paint Rock Spring, McGregor Spring, and Cottonwood Spring. Most are a fraction of an acre. Vegetation includes mostly grasses, forbs, and a few shrubs and trees at some. Paint Rock Spring needs no protection from grazing at the spring, which is in the bottom of Paint Rock Canyon, because wild horses and livestock can be excluded from the source by fencing across the steep-walled canyon. The other four riparian sites have either already been fenced or will be fenced if necessary to protect the source and riparian vegetation from livestock and wild horses. Water is or will be provided for these animals outside the exclosures. In addition, Bobcat Spring supports no riparian site, but has been developed to protect the source and provide water for animals. Cliff Spring, Martinez Spring, and Redrock Spring have never been developed and are not considered suitable for development.

LIVESTOCK GRAZING

The WSA is entirely within the Pilot Mountain/Table Mountain Allotment, where one grazing permittee keeps cattle during winter. About 4,225 animal unit months of forage utilization are estimated for the WSA portion of the allotment. Springs in the WSA have been developed to provide water for livestock and protect the springs from livestock. Other than riparian site protection, no other range improvements are necessary or planned.

WILD HORSES

The Gabbs Valley Range WSA lies within the Pilot Mountain Herd Area. An estimated 200 head of wild horses inhabit the WSA, although they are not confined to the WSA. The WSA portion of the Herd Area can support a maximum of 400 head, at which point the Bureau plans to reduce the population

to an initial management level of 150 head. Numbers will then be allowed to increase again to the maximum level of 400 head. To reduce populations, the Bureau herds wild horses into temporary corral traps by helicopter and transports them from the area by truck. Springs are developed in the WSA to provide horses water and protect the springs from wild horses.

WILDLIFE

All of the WSA is year-long deer range. It also supports bobcats, mountain lions, sage grouse, chukar, raptors, song birds, small rodents, and reptiles. Springs have been developed in the WSA to provide water for wildlife and to protect the springs from grazing animals. No other habitat management actions are expected in the future.

WOODLAND PRODUCTS

Pinyon pine and juniper forest covers more than 8,000 acres in the southern half of the WSA. About 1,400 acres of this forest are located such that harvest for cordwood would be feasible for both commercial and noncommercial markets. Pine nut crops are occasionally good, but no commercial sales have been requested there.

LANDS

Four private parcels are surrounded by the WSA. Three are "cherrystemmed" so that access to them is possible without entering the WSA. One forty-acre private parcel in Section 15 of T. 10 N., R. 34 E., is without access except through the WSA. It is possible to drive to that parcel, but the owner has no right-of-way to the land, nor is an application for a right-of-way expected in the future.

RECREATION

Visitors spend an estimated 78 visitor-days of recreation yearly in the WSA. About 80 percent (62 visitor-days) of that is motor vehicle related, and 20 percent is non-motorized. About 30 visitor-days are spent fur-trapping, 20 are spent hunting deer, 20 are spent hunting upland game, and 8 are spent rockhounding and sightseeing.

CULTURAL RESOURCES

Very little archaeological investigation has been done inside the study area to date. The Paint Rock Spring Shelter and Pictographs is a significant site on the east side at the end of a "cherrystemmed" road, partly on private land. Nomination of the site to the National Register of Historic Places is not anticipated.

BURBANK CANYONS WSA
(NV-030-525a)

The Burbank Canyons Wilderness Study Area is located primarily in Douglas County, Nevada, five miles northwest of Wellington, Nevada, via State Highway 208 and Colony Road. Approximately 1,065 acres along the eastern edge of the study area are located in Lyon County. The WSA contains 13,395 acres of public lands and averages 3.5 miles in length from north to south and 6 miles in width from east to west (Map 7, page 3-14). It comprises parallel canyon drainages and intervening ridges on the east slope of the Pine Nut Mountains. The majority of the area is mountainous, with pinion-juniper-sagebrush associations predominating. Riparian vegetation including wild rose, willow, chokecherry, aspen, and meadow, is found on a total of 300 acres in the bottoms along the Red Canyon and Burbank Canyon drainages.

Boundaries of the WSA are formed on the north by the road in Red Canyon, on the south by the road in Wedertz and Rickey Canyons, on the east by private land and roads in Smith Valley (4,800 feet), and on the west by roads and private land along the crest of Bald Mountain (9,206 feet). Eagle Mountain (8,951 feet) overlooks Smith Valley and most of the WSA. The two-mile-long south fork of Red Canyon is steep and v-shaped and contains a small stream and very dense riparian vegetation. Parallel Burbank Canyon is less steep and more open, three miles long with a meadow, springs, and aspen groves at its head. Little Burbank Canyon closely parallels Burbank Canyon; it is much smaller and contains no riparian areas.

The WSA generally appears to have been affected primarily by the forces of nature, although mining activities have disturbed small sites within and adjacent to the boundary on all sides.

WILDERNESS VALUES

- Naturalness

  The area is generally free from human imprints and is in a natural state. There are approximately 2.5 miles of ways, most very short, leading into the WSA from the periphery. Five cherrystemmed roads penetrate the WSA, three from the east side, one from the southern boundary road, and one on the north side in Red Canyon. Two parcels of private land totalling 57 acres are surrounded by the WSA with access by cherrystemmed roads.

  Mining activity, consisting of small diggings and cat trails, is located along the ridgetop on the western side of the unit, in Red Canyon and near the patented lands. This activity and associated access roads impact an additional estimated 1,500 acres of the area's perceived naturalness where these activities can be readily viewed in the foreground from within the WSA.

The total impact of human intrusions, where they can be viewed from within the WSA, occurs on approximately 17 percent of the WSA. The majority of the unit remains natural with the best of the unit's natural qualities occuring in Burbank Canyon and the south fork of Red Canyon. The human activities having the most impact on naturalness include ways in and near Red Canyon, ways on the ridgecrest, and the Premier Mine.

- Opportunity for Solitude

The unit's relatvely small size limits the opportunities for solitude. The central Burbank Canyon portion of the unit contains a good opportunity for solitude provided by high ridges surrounding the canyon and its two forks. The opportunity exists in just one area, however, so that the overall capacity to provide solitude for more than one party of visitors at one time is limited. On ridgetops around the unit, outside sights and sounds of civilization from the surrounding valleys are apparent due to the lack of vegetative screening and the small size of the WSA.

- Opportunity for Primitive, Unconfined Recreation

Recreational opportunities include hiking, backpacking, horseback riding, camping, hunting, and sightseeing. The best opportunity is confined to Burbank Canyon. The South Fork of Red Canyon is steep, narrow, and very brushy--making passage by visitors difficult. The scenic natural quality of the area would serve to attract visitors to the WSA.

- Special Features

The area contains good scenic quality. The Walker RMP provides for administrative designation as a scenic area to make the public aware of the scenic resource.

The unit contains a total of approximately 300 acres of riparian habitat in Burbank and Red Canyons, which supports a variety of wildlife and enhances nature study opportunities in the WSA. Vegetation includes mostly grasses and forbs with stands or patches of wild rose, willow, chokecherry, black cottonwood, and aspen. Both canyons have two forks, each of which contains riparian areas. High in each canyon fork, springs and seeps contribute water which flows in the drainages and at some places and times disappears beneath the surface.

Approximately four miles of Red Canyon is perennial stream that has been stocked with brook trout, which have become established as a small population of small fish. The creek, however, lies directly adjacent to the northern boundary road, which makes the stream resource an enhancing but peripheral wilderness value.

An isolated stand of western white pine located at the very western edge of the WSA adds to the area's vegetative diversity and interest.

MINERALS AND ENERGY

The Pine Nut Mountain Range is part of a larger structure and is a broad, complex block, sharply upfaulted on the east and tilted west. The oldest rocks in the WSA are metamorphosed Triassic Jurassic formations, mainly sedimentary, in Red Canyon along the north boundary. Another, smaller metamorphased Triassic-Jurassic unit (volcanic rocks) lies just inside the southwestern boundary of the WSA. These were intruded by Cretaceous quartz monzonites and grandiorites associated with the Sierra Nevada batholith, with attendent shearing, folding, and recrystallization. A large part of the WSA is underlain by the granitic intrusives.

The WSA is within the eastern portion of the Red Canyon Mining District and contains or is surrounded by mines and prospects (Map 8, page 3-15). Records put production from this district at about $1,000,000 (at 1980's gold prices), mainly in gold and silver. High grade silver-lead-zinc ore was mined just north of the WSA, and a copper prospect (a currently inoperative mine) is located on the northeast boundary. Copper-zinc geochemical anomalies are noted inside and just north of the WSA. Two separate patented gold claims lie within the eastern half of the WSA. Most of the various types of mineral deposits discovered thus far in the Red Canyon Mining District have been relatively small, although many have been of high grade. The widespread mineralization associated with the emplacement of the Cretaceous granitics may have resulted in much larger deposits such as porphyry copper, porphyry molybdenum, or even major contact metamorphic tungsten deposits.

There are no known nonmetallic mineral deposits within the WSA, but a small common-use area for rip-rap material is located on the north boundary. Favorability for important non-metallic mineral deposits is low.

A number of springs and wells with temperatures ranging from 70 to over 140 degrees Fahrenheit are found along the eastern range front of the Pine Nut Mountains in the vicinity of the WSA. This immediate region is a known geothermal area (GEM, 1983). The Late Tertiary normal faulting that caused the present-day topography of the mountains is believed to have resulted in 3,200 feet of vertical displacement along the range front. Faulting of such magnitude may well have created the conduit for ascending thermal waters, accounting for the linear occurrence of the hot springs and wells along the range front. Approximately 1400 acres along the eastern portion of the WSA are highly favorable for occurrence of geothermal resources. However, geothermal leasing and development are not likely to be allowed by the Bureau in the WSA, because such development would conflict with scenic values for which the area is designated a scenic area.

No oil and gas resources are known to exist in the WSA and no exploration is known to have taken place in this area. The subject lands are not favorable for occurrence of oil and gas. Likewise, there are no uranium occurrences in or adjacent to the WSA, and favorability for uranium is low.

At least one mine in the WSA, the Premier Mine, is scheduled for expansion. The geology of the area, plus the existence of numerous mines and prospects in and around the WSA result in the conclusion that over 90 percent of the subject lands are highly (3700 acres) to moderately (8000 acres) favorable for the occurrence of metallic mineral deposits (Map 8, page 3-15).

Six of the metals known to occur in or very near the WSA are classed as strategic and/or critical metals. These are: (strategic metals) silver, copper, lead, and tungsten; (strategic and critical metals) zinc and antimony (GEM, 1983).

The only potential for conflicts between riparian area values and the exploration for and development of mineral and energy resources is in Red Canyon, where four miles of perennial stream flow immediately adjacent to the northern WSA boundary road. The road would have to be upgraded for use in support of the Premier Mine.

There are 47 unpatented mining claims within the WSA over a total of 940 acres.

LIVESTOCK GRAZING

Portions of the Red Burbank and the Spring Gulch Allotments lie within the WSA. The Red Burbank Allotment is a summer cattle allotment which has not been used for a few years but remains a viable allotment. Riparian areas in the area are in excellent condition. About 120 of the 180 AUMs adjudicated in this allotment are within the WSA. The Spring Gulch allotment is a sheep allotment which is licensed year-round but is actually used during late spring and summer months. About 1,110 of the 3,947 AUMs adjudicated in that allotment are within the WSA. There are no range improvements inside the WSA, and none are projected to be needed.

WILDLIFE

Mule deer, mountain lions, bobcats, sage grouse, mountain quail, golden eagles, and other raptors are present. The lower elevations of the WSA are part of the winter range for an interstate deer herd. Red Canyon Creek, immediately adjacent to the northern boundary road, provides 3.5 miles of marginally fishable stream. It is a small creek with limited stream flow and supports a small population of small brook trout. The northern side of the WSA, along Red Canyon, is part of a much larger area used for hunting in winter by a bald eagle--the only known endangered species to occasionally inhabit the area.

WOODLAND PRODUCTS

A limited amount of commercial pine nut gathering is occasionally authorized in the WSA. Only 500 acres of woodland found in the study area could be harvested for fuelwood, and demand for a cutting area in that location is low. No plans to harvest firewood in the area are projected for the future, even if the area were not designated wilderness.

RECREATION

An estimated 97 visitor-days are spent in the WSA annually, of which 25 are spent hunting upland game, 20 hunting deer, 8 in fishing, 35 hiking and camping, and 8 in pine nut gathering or general sightseeing. Most of the recreation is non-motorized, as the terrain is too rough to be suitable for off-road vehicle travel. Additional motorized recreation occurs along the roads which form the WSA boundaries.

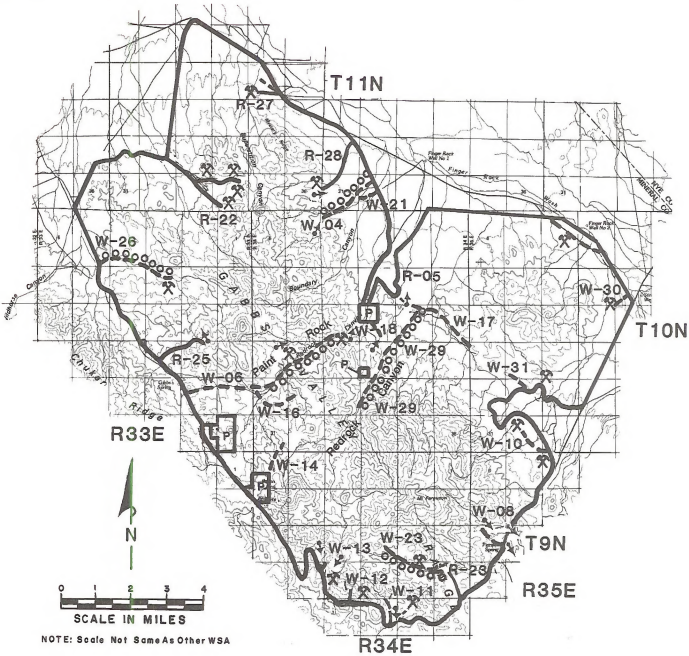
The day-hiking opportunity is good along Burbank Canyon, a three-mile trip one way. Dense riparian vegetation in the narrow south fork of Red Canyon greatly impedes travel. There is little to attract hikers in Little Burbank Canyon.

Longer-term backpacking and camping is limited because of the area's small size and topography that limits most hiking to the canyon bottoms.

The steep slopes at the upper end of the canyons would provide challenging hiking but would not require mountaineering or rock climbing skills.

CULTURAL RESOURCES

Three mining camps were once located inside or on the border of the WSA, but virtually all physical remains have been obliterated. An old Spanish arrastra ruin is associated with the Premier Mine.



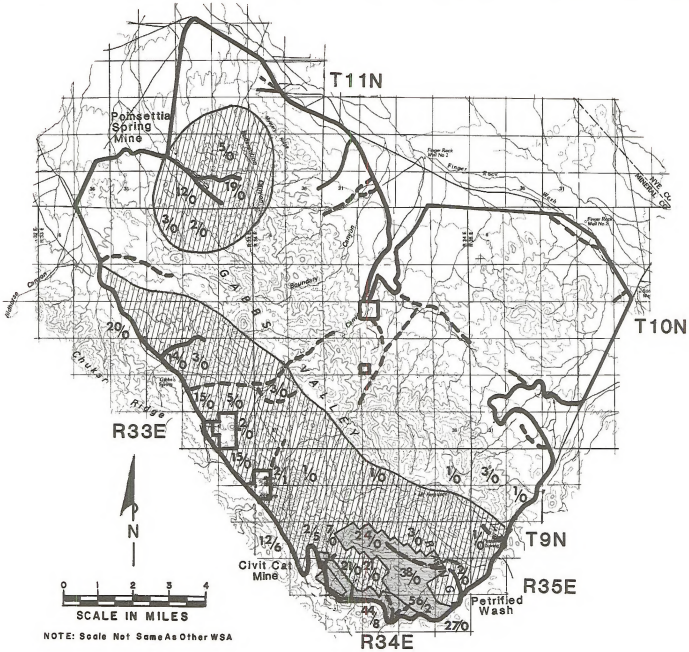
LEGEND

═══	ROADS
- - - -	WAYS
oooo	WAY IN WASH
W-11	WAY IDENTIFICATION NUMBER
R-11	ROAD IDENTIFICATION NUMBER
⚒	MINING ACTIVITY
P	PRIVATE LAND
⊶	DEVELOPED SPRING

EXISTING SITUATION

GABBS VALLEY RANGE NV-030-407

MAP 3



NOTE: Scale Not Same As Other WSA

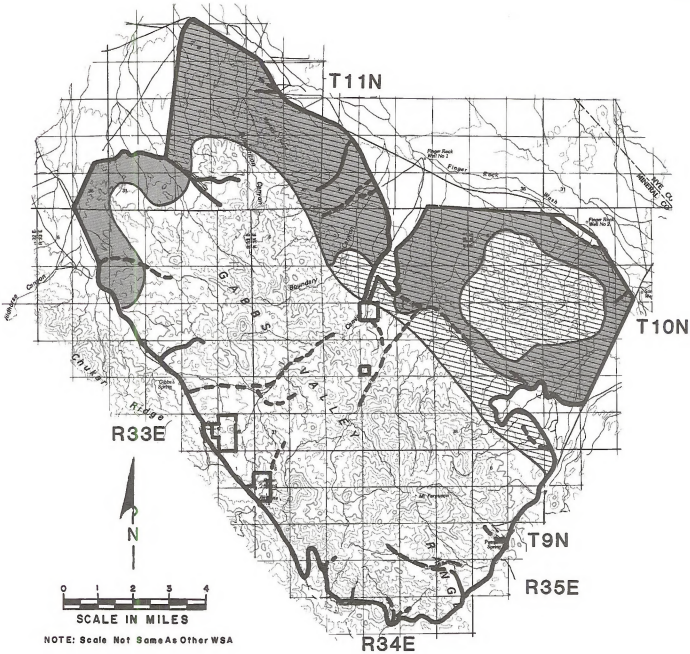
LEGEND

- LOW FAVORABILITY FOR ACCUMULATION OF MINERALS
- MODERATE TO HIGH FAVORABILITY FOR ACCUMULATION OF MINERALS
- 2/5 POST/PRE FLPMA MINING CLAIMS (AS OF JUNE 1984)
- CLAIM BLOCKS

METALLIC MINERAL POTENTIAL

GABBS VALLEY RANGE NV-030-407

MAP 4



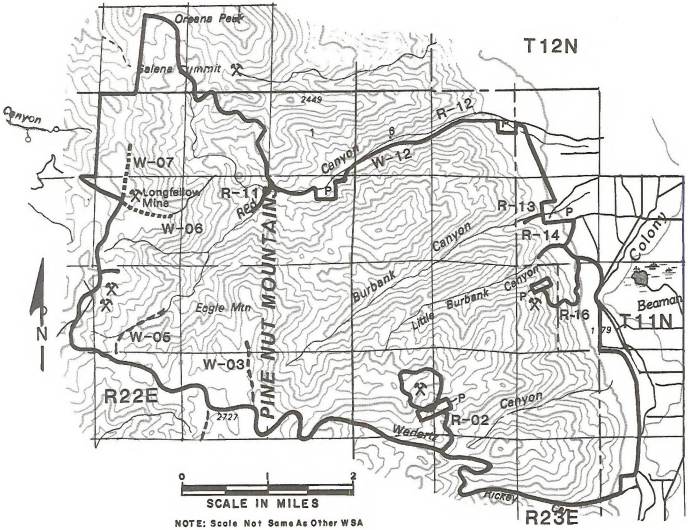
LEGEND

- LOW FAVORABILITY
- MODERATE FAVORABILITY FOR ACCUMULATION OF NONMETALLIC MINERALS
- MODERATE FAVORABILITY FOR ACCUMULATION OF GEOTHERMAL RESOURCES

NON METALLIC AND GEOTHERMAL RESOURCE POTENTIAL

GABBS VALLEY RANGE NV-030-407

MAP 5



LEGEND

———	ROADS
- - - -	WAYS
W-11	WAY IDENTIFICATION NUMBER
R-11	ROAD IDENTIFICATION NUMBER
⚒	MINING ACTIVITY
P	PRIVATE LAND

EXISTING SITUATION

BURBANK CANYONS NV-030-525A

MAP 7

NOTE: Scale Not Same As Other WSA

LEGEND

- LOW FAVORABILITY FOR ACCUMULATION OF OF METALLIC MINERALS
- MODERATE FAVORABILITY FOR ACCUMULATION OF METALLIC MINERALS
- HIGH FAVORABILITY FOR ACCUMULATION OF METALLIC MINERALS,
- HIGH FAVORABILITY FOR ACCUMULATION OF GEOTHERMAL RESOURCES
- 8/8 POST/PRE FLPMA MINING CLAIMS (AS OF JUNE 1984)

MINERAL POTENTIAL

BURBANK CANYONS NV-030-525A

MAP 8

Photo 1. Aerial winter view southeastward into the basin of Redrock Canyon, Gabbs Valley Range WSA. Highest point on ridge and in WSA is Mount Ferguson.

Photo 2. Aerial winter view southward at northern end of Gabbs Valley Range WSA.

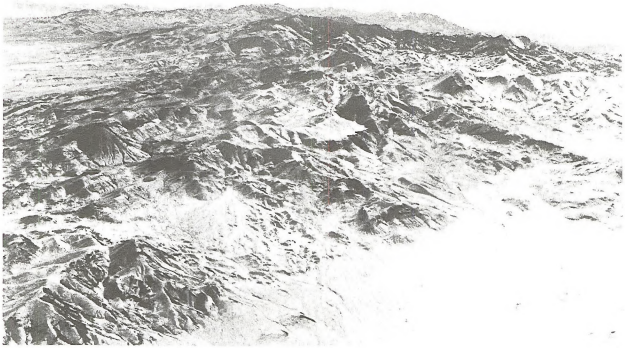


Photo 3. Aerial winter view westward shows most of Burbank Canyons WSA. Burbank Canyon lies at center, Little Burbank Canyon at left, eastern WSA boundary near foreground, and western boundary along ridgetop below skyline.
Photo 4. Northern boundary is road in bottom of Red Canyon at right.

CHAPTER FOUR

ENVIORONMENTAL CONSEQUENCES

CHAPTER 4

ENVIRONMENTAL CONSEQUENCES

This chapter focuses directly on the issues identified in Chapter 1. For each wilderness study area, the environmental impacts of each alternative are analyzed issue by issue.

GABBS VALLEY RANGE WSA
(NV-030-407)

PROPOSED ACTION (No Wilderness/No Action)
0 Acres Suitable for Wilderness
79,600 Acres Nonsuitable for Wilderness

Under the Proposed Action, none of the 79,600 acres in the Gabbs Valley Range WSA would be recommended suitable for wilderness designation. All would be managed for multiple use.

The primary impacts under this alternative would relate to wilderness values, mineral development, motorized recreation, and fuelwood harvest.

Impacts on Wilderness Values

Mineral exploration activities on 496 unpatented mining claims would cause the most impacts to wilderness values in the Gabbs Valley Range WSA. Exploration activities would entail construction of roads, drill pads, drilling sumps, small trenches dug by backhoe, larger bulldozed trenches, and off-road motorized vehicle travel. Annual aggregated surface disturbance would average 25 acres per year including 11 miles of constructed roadway 14 feet wide. Most of these activities would be concentrated within a two-mile radius of Poinsettia Spring Mine at the north end of the WSA and within a three-mile-wide strip along the southwest side of the WSA.

The effects of these exploration activities on wilderness values would be a decrease in naturalness and opportunities for solitude and primitive and unconfined recreation. While the ground actually disturbed would be about 25 acres annually or a total of 1,250 acres, the reduction of the natural appearance would extend across the areas within a two-mile radius of Poinsettia Spring Mine and within a three-mile-wide strip along the southwest side of the WSA. New roads and other signs of earth-moving would be plainly visible within these parts of the WSA. Upland vegetation would be destroyed in the process. The loud sounds of heavy machinery and vehicles would not be constant but would occasionally be very obvious. No riparian sites would be affected.

Most of the exploration-related disturbance would occur in parts of the WSA not containing the best wilderness values of opportunity for solitude and primitive and unconfined recreation. However, the disturbance would extend well into the western portion of the basin of Redrock Canyon, where the best wilderness values do occur. There the appearance of naturalness and the opportunity for solitude would be noticeably diminished. This in turn would reduce the aesthetic appearance and therefore the desirability of the basin area as an opportunity for primitive and unconfined recreation.

An open-pit gold mining operation in the Petrified Wash area would disturb a total of 170 acres at the south side of and within the WSA. Ten miles of access roads 30 feet wide, the mine pit, leach pads and ponds, mine dumps, four miles of powerline with attendant roads, and three buildings would be sited on small ridgetops, sideslopes, and in minor ravines, all within the WSA. The disturbance would be plainly visible, and the loud sounds of heavy machinery would occasionally be audible, from one to two miles away depending upon the surrounding terrain. The appearance of naturalness and the opportunity for solitude within that space would be markedly reduced as land is cleared and the surface altered. This disturbance would not be noticeable from within the basin of Redrock Canyon, where the best wilderness values in the WSA are present. The disturbance would be noticeable from the top of Mount Ferguson and the ridge at the south side of the basin of Redrock Canyon. This would adversely affect the opportunity for primitive and unconfined recreation somewhat, but not to the point that much of the wilderness value would be lost. No riparian sites would be affected.

An open-pit gold-mining operation near the Civit Cat Mine would disturb about 105 acres within the WSA at the southwestern edge. Two small mine pits, three miles of haul roads, plus waste dumps, drill pads, and staging areas would be constructed in two small canyons near the existing surface disturbance of Civit Cat Mine. The impacts on the appearance of naturaless and opportunities for solitude and primitive and unconfined recreation would be confined to the immediate project location, because the ridges rimming the canyons would screen the disturbance from perception outside the site. The operation would have no effect on the best wilderness values of the WSA in the basin of Redrock Canyon. No riparian sites would be affected.

An open-pit gold-mining operation at the northern end of the WSA near Poinsettia Spring Mine would cause about 70 acres of surface disturbance in low, rolling hills within the WSA in addition to 30 acres adjacent to the WSA. A 60-foot-wide road 0.7 miles long would be built around a 40-acre pit complex. Waste dumps would occupy an additional 40 acres. The reduction in the appearance of naturalness and the opportunity for solitude would take effect within a two-mile radius of Poinsettia Spring Mine. The best wilderness values of the WSA in the basin of Redrock Canyon would not be at all affected by the operation.

Mineral-related surface disturbance would total 2,595 acres.

Mineral exploration activities in the basin of Redrock Canyon, including construction of new roads, would bring an increase in motorized recreation

from 62 visitor-days to 130 visitor-days along with the increased access. The motorized recreation in the basin of Redrock Canyon would increase from 12 to 40 visitor-days and contribute to the degradation of the wilderness values there by reducing the opportunity for solitude.

Fuelwood harvest in four woodcutting areas would affect wilderness values by the sounds of chainsaws and motorized vehicles, the reduction of vegetative cover on 1,400 acres, and the establishment of six miles of vehicle ways. All cutting areas would be to the south and west of the basin in Redrock Canyon, outside the area where the best wilderness values in the WSA are found.

> Conclusion. Mineral exploration activities would substantially diminish opportunities for solitude and primitive recreation in the area's most visually diverse and isolated section on the northeast side of Mount Ferguson in the basin of Redrock Canyon. Riparian sites would not be affected. Elsewhere in the WSA, where wilderness values are lower, mineral exploration, mining, fuelwood harvest, and motorized recreation would cause minor impacts to wilderness values overall, mainly due to a net reduction of the size of the area which would remain primarily natural in appearance by about 4,000 acres.

Impacts on Mineral Development

All lands within the WSA would remain open for mineral entry and mineral leasing. All potential mineral resources would be available for exploration and development. Exploration would resume on 496 mining claims. Three moderate-sized open-pit gold-mining operations would proceed as described under the Proposed Action.

> Conclusion. There would be no impact on exploration for or the development of mineral resources.

Impacts on Motorized Recreation

The Gabbs Valley Range WSA would remain open to motorized vehicle use. The estimated 62 visitor-days of motorized recreation would increase to 130 visitor-days due to the increase of 11 miles of new roads per year constructed for mineral exploration. The level of intensity of visitor use in the area would still be considered low.

> Conclusion. There would be no impact on motorized recreation.

Impacts on Fuelwood Harvest

Pinyon pine and juniper woodlands would again be available for the harvest of fuelwood. Commercial woodcutters and the general public would harvest as

much as 5,600 cords of fuelwood from three commercial sale areas and one non-commercial public cutting area over the next 50 years.

Conclusion. There would be no impact to the harvest of fuelwood.

RELATIONSHIP BETWEEN LOCAL SHORT-TERM USES OF MAN'S ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

Long-term productivity would be maintained and not significantly reduced by the projected mineral exploration, expansion of mining, and fuelwood harvest. Visual evidence of surface disturbance would remain indefinitely but would be confined to sites which would not alter the landscape character as a whole.

IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES

Sites projected to be mined or disturbed by exploration would be committed irreversibly and irretrievably to mining. These sites would not be so expansive that they would dominate the landscape character of the entire WSA, and the commitments of resources would be largely restricted to those local sites. However, wilderness values would gradually and substantially be diminished.

PARTIAL WILDERNESS ALTERNATIVE A (Gabbs Valley Range WSA)
27,860 Acres Suitable for Wilderness
51,740 Acres Nonsuitable for Wilderness

Under Partial Wilderness Alternative A, 27,860 acres would be recommended suitable for wilderness designation. The remaining 51,740 acres would be managed for multiple use. The rationale for this alternative would be to designate wilderness in the portion of the WSA containing only the best of the wilderness values and to allow other land and resource areas to continue in the rest of the WSA.

The primary impacts of this alternative would relate to wilderness values, mineral development, motorized vehicle use, and fuelwood production.

Impacts on Wilderness Values

Wilderness designation on 27,860 acres would provide legislative protection for the best wilderness values of the WSA in the south-central part between Paint Rock Canyon on the north and Petrified Wash on the south. This area would contain the entire basin of Redrock Canyon. Surface disturbing activities associated with mineral exploration, development of mineral resources, fuelwood harvest, and motorized recreation would not be allowed to take place. The values of naturalness and opportunities for solitude and primitive and unconfined recreation would be preserved in perpetuity within the 27,860 acres.

In the remaining 51,740 acres managed for multiple use, exploration for and development of mineral resources would be resumed on 446 unpatented claims. Exploration activities would entail construction of roads, drill pads, drilling sumps, small trenches dug by backhoe, larger bulldozed trenches, and off-road motorized vehicle travel. Annual aggregated surface disturbance would average 20 acres per year, including 8 miles of constructed roadway 14 feet wide. Most of these activities would be concentrated within a two-mile radius of Poinsettia Spring Mine at the north end of the WSA and within a three-mile-wide strip along the southwest side of the WSA.

The effects of these exploration activities on wilderness values would be a decrease in naturalness and opportunities for solitude and primitive and unconfined recreation. While the ground actually disturbed would be about 20 acres annually or a total of 1,000 acres, the reduction of the natural appearance would extend across the areas within a two-mile radius of Poinsettia Spring Mine and within a three-mile-wide strip along the southwest side of the WSA. New roads and other signs of earth-moving would be plainly visible within these parts of the WSA. Vegetation would be destroyed in the process. The sounds of heavy machinery and vehicles would not be constant but would occasionally be very obvious. Riparian sites would not be affected.

The exploration-related disturbance would occur in parts of the WSA not containing the best wilderness values of opportunity for solitude and primitive and unconfined recreation.

An open-pit gold mining operation in the Petrified Wash area would disturb a total of 170 acres at the south side of and within the WSA. Ten miles of access roads 30 feet wide, the mine pit, leach pads and ponds, mine dumps, four miles of powerline with attendant roads, and three buildings would be sited on small ridgetops, sideslopes, and in minor ravines, all within the WSA. The disturbance would be visible, and the sounds of heavy machinery would occasionally be audible, from one to two miles away depending upon the surrounding terrain. The appearance of naturalness and the opportunity for solitude within that space would be markedly reduced. This disturbance would not be noticeable from within the 27,860-acre wilderness, which would contain the best wilderness values in the WSA. The disturbance would be noticeable from the top of Mount Ferguson and the ridge at the south side of the basin of Redrock Canyon. This would adversely affect the opportunity for primitive and unconfined recreation somewhat, but not to the point that much of the wilderness value would be lost. No riparian sites would be affected.

An open-pit gold-mining operation near the Civit Cat Mine would disturb about 105 acres within the WSA at the southwestern edge. Two small mine pits, three miles of haul roads, plus waste dumps, drill pads, and staging areas would be constructed in two small canyons near the existing surface disturbance of Civit Cat Mine. The impacts on the appearance of naturaless and opportunities for solitude and primitive and unconfined recreation would be confined to the immediate project location, because the ridges rimming the canyons would screen the disturbance from perception outside the site. No riparian sites would be affected. The operation would have no effect on the wilderness values within the 27,860-acre wilderness.

An open-pit gold-mining operation at the northern end of the WSA near Poinsettia Spring Mine would cause about 70 acres of surface disturbance in low, rolling hills within the WSA in addition to 30 acres adjacent to the WSA. A 60-foot-wide road 0.7 miles long would be built around a 40-acre pit conplex. Waste dumps would occupy an additional 40 acres. The reduction in the appearance of naturalness and the opportunity for solitude would take effect within a two-mile radius of Poinsettia Spring Mine. The wilderness values within the 27,860-acre wilderness would not be at all affected by the operation. No riparian sites would be affected.

Mineral-related surface disturbance would total 2,345 acres.

Fuelwood harvest in two woodcutting areas would affect wilderness values by the sounds of chainsaws and motorized vehicles, the reduction of vegetative cover on 600 acres, and the establishment of six miles of vehicle ways. All cutting areas would be to the south and west of the basin in Redrock Canyon, outside the area where the best wilderness values in the WSA are found.

> Conclusion. Wilderness designation on 27,860 acres would preserve the area's best opportunities for solitude and primitive recreation centered around the area's most prominent and diverse features, including Redrock Canyon and Mount Ferguson. Elsewhere in the WSA, where these wilderness values are lower, mineral exploration, mining, fuelwood harvest, and motorized recreation would cause minor impacts to wilderness values overall, mainly due to a net reduction of the size of the area which would remain primarily natural in appearance by 2,945 acres. No riparian sites would be affected.

Impacts on Mineral Development

Although no economically viable mineral resources are likely to be developed in the 27,860 acres designated wilderness, the loss of opportunity to explore for minerals on 50 claims would still be an impact.

The remaining 51,740 acres within the WSA would remain open for mineral entry and mineral leasing. All potential mineral resources would be available for exploration and development. Exploration would resume on 446 mining claims. Three moderate-sized open-pit gold-mining operations would proceed as described under the Proposed Action.

> Conclusion. Wilderness designation would prevent mineral exploration on 27,860 acres and 50 mining claims. There would be no impact on exploration for or the development of mineral resources in the remaining 51,740 acres and 446 claims. Three open-pit mining operations would proceed.

Impacts on Motorized Recreation

Wilderness designation on 27,860 acres would prevent 12 visitor-days of motorized recreation in the basin of Redrock Canyon.

The remaining 51,740 acres of the WSA would remain open to motorized vehicle use. The estimated 62 visitor-days of motorized recreation would increase to 90 visitor-days due to the increase of 8 miles of new roads per year constructed for mineral exploration, to displacement of vehicle use from the closed area, and to increased demand for access to wilderness. The level of intensity of visitor use in the area would still be considered low.

> Conclusion. Wilderness designation on 27,860 acres would prevent 12 visitor-days of motorized recreation in the basin of Redrock Canyon. Designation would also cause a small increase in motorized recreation in the remaining 51,740-acre area.

Impacts on Fuelwood Harvest

Pinyon pine and juniper woodlands would again be available for the harvest of fuelwood on 600 acres. Commercial woodcutters and the general public would harvest as much as 2,900 cords of fuelwood from one commercial sale area and one non-commercial public cutting area over the next 50 years. However, 2,700 cords within the wilderness would not be available for harvest. The local demand would be readily supplied from other potential cutting areas outside the USA in the vicinity.

> Conclusion. Wilderness designation would reduce the harvest of fuelwood in the WSA by 2,700 cords. This local demand would be readily supplied from other local sources.

PARTIAL WILDERNESS ALTERNATIVE B (Gabbs Valley Range WSA)
68,170 Acres Suitable for Wilderness
11,430 Acres Nonsuitable for Wilderness

Under Partial Wilderness Alternative B, 68,170 acres would be recommended suitable for wilderness designation. The remaining 11,430 acres would be managed for multiple use. The rationale for this alternative would be to designate wilderness in the maximum feasible acreage of the WSA without regard for varying quality of wilderness values and excluding only the portions already disturbed or expected to be disturbed by mining based on valid, existing rights.

The primary impacts of this alternative would relate to wilderness values, mineral development, motorized vehicle use, and fuelwood production.

Impacts on Wilderness Values

Wilderness designation on 68,170 acres would provide legislative protection for the best wilderness values of the WSA in the south-central part, containing the entire basin of Redrock Canyon and Paint Rock Canyon along with an additional 40,310 acres. Surface disturbing activities associated with mineral exploration, development of mineral resources, fuelwood harvest, and motorized recreation would not be allowed to take place. The values of naturalness and opportunities for solitude and primitive and unconfined recreation would be preserved in perpetuity within the 68,170 acres.

In the remaining 11,430 acres managed for multiple use, exploration for and development of mineral resources would be resumed on 198 unpatented claims. Exploration activities would entail construction of roads, drill pads, drilling sumps, small trenches dug by backhoe, larger bulldozed trenches, and off-road motorized vehicle travel. Annual aggregated surface disturbance would average 15 acres per year, including 6 miles of constructed roadway 14 feet wide. The disturbance would affect a total of 750 acres. Most of these activities would be concentrated within a two-mile-wide strip along the southwest side of the WSA. No riparian sites would be affected.

The effects of these exploration activities on wilderness values would be a decrease in naturalness and opportunities for solitude and primitive and unconfined recreation. While the ground actually disturbed would be about 15 acres annually, the reduction of the natural appearance would extend across the areas within a two-mile-wide strip along the southwest side of the WSA. New roads and other signs of earth-moving would be plainly visible within these parts of the WSA. Vegetation would be destroyed in the process. The sounds of heavy machinery and vehicles would not be constant but would occasionally be very obvious.

The exploration-related disturbance would occur in parts of the WSA not containing the best wilderness values of opportunity for solitude and primitive and unconfined recreation.

An open-pit gold mining operation in the Petrified Wash area would disturb a total of 170 acres at the south side of and within the WSA. Ten miles of access roads 30 feet wide, the mine pit, leach pads and ponds, mine dumps, four miles of powerline with attendant roads, and three buildings would be sited on small ridgetops, sideslopes, and in minor ravines, all within the WSA. The disturbance would be visible, and the sounds of heavy machinery would occasionally be audible, from one to two miles away depending upon the surrounding terrain. No riparian sties would be affected. The appearance of naturalness and the opportunity for solitude within that space would be markedly reduced. This disturbance would not be noticeable from within the basin of Redrock Canyon, which contain the best wilderness values in the WSA, but it would be evident from the south side of the wilderness. The part of the wilderness south of Mount Ferguson would serve as a buffer between the mine in Petrified Wash and the wilderness values in Redrock Canyon.

An open-pit gold-mining operation near the Civit Cat Mine would disturb about 105 acres within the WSA at the southwestern edge. Two small mine pits, three miles of haul roads, plus waste dumps, drill pads, and staging areas would be constructed in two small canyons near the existing surface disturbance of Civit Cat Mine. No riparian sites would be affected. The impacts on the appearance of naturaless and opportunities for solitude and primitive and unconfined recreation would be confined to the immediate project location, because the ridges rimming the canyons would screen the disturbance from perception outside the site. The operation would have no effect on the wilderness values within the 27,860-acre wilderness.

An open-pit gold-mining operation at the northern end of the WSA near Poinsettia Spring Mine would cause about 70 acres of surface disturbance in low, rolling hills within the wilderness, based on valid, existing rights, in addition to 30 acres adjacent to the WSA. A 60-foot-wide road 0.7 miles long would be built around a 40-acre pit complex. Waste dumps would occupy an additional 40 acres. The reduction in the appearance of naturalness and the opportunity for solitude would take effect in the wilderness within a two-mile radius of Poinsettia Spring Mine. No riparian sites would be affected. The best wilderness values of the WSA within the basin of Redrock Canyon would not be at all affected by the operation.

Mineral-related disturbance would total 1,095 acres.

Fuelwood harvest in one public woodcutting areas would affect wilderness values by the sounds of chainsaws and motorized vehicles, the reduction of vegetative cover on 500 acres, and the establishment of two miles of vehicle ways. The cutting area would be to the south and west of the basin in Redrock Canyon, outside the area where the best wilderness values in the WSA are found. The sounds of woodcutting would be audible from within the southern end of the wilderness south of Mount Ferguson. No riparian sties would be affected.

> Conclusion. Wilderness designation on 68,170 acres would preserve the area's overall natural condition and the best opportunities for solitude and primitive recreation. Legal protection would be afforded for the prominent features of Mount Ferguson and Redrock Canyon, along with Paint Rock Canyon and the moderately dissected desert landscapes on the northern side of the WSA. In the remaining 11,430 acres where these wilderness values are lower, mineral exploration, mining, fuelwood harvest, and motorized recreation would cause minor impacts to wilderness values overall, mainly due to a net reduction by about 1600 acres in the area which would remain primarily natural in appearance. Riparian sites would not be affected.

Impacts on Mineral Development

Although no economically viable mineral resources are likely to be developed in the 68,170 acres designated wilderness, the loss of opportunity to explore for minerals on 298 claims would still be an impact.

The remaining 11,430 acres within the WSA would remain open for mineral entry and mineral leasing. Potential mineral resources would be available for exploration and development. Exploration would resume on 198 mining claims. Three moderate-sized open-pit gold-mining operations would proceed as described under the Proposed Action.

> Conclusion. Wilderness designation would prevent mineral exploration on 68,170 acres and 298 mining claims. There would be no impact on exploration for or the development of mineral resources in the remaining 11,430 acres and 198 claims. Three open-pit mines would operate.

Impacts on Motorized Recreation

Wilderness designation on 68,170 acres would prevent 46 vistor-days of motorized recreation in the basin of Redrock Canyon, in Paint Rock Canyon, and in most of the WSA.

The remaining 11,430 acres of the WSA would remain open to motorized vehicle use. The estimated 62 visitor-days of motorized recreation would increase to 75 visitor-days due to the increase of 6 miles of new roads per year constructed for mineral exploration, to displacement of vehicle use from the closed area, and to increased demand for access to wilderness. The level of intensity of visitor use in the area would still be considered low.

> Conclusion. Wilderness designation on 68,170 acres would prevent 46 visitor-days of motorized recreation in the basin of Redrock Canyon. Designation would also cause a very small increase in motorized recreation in the remaining 11,430-acre area.

Impacts on Fuelwood Harvest

Pinyon pine and juniper woodlands would again be available for the harvest of fuelwood on 500 acres outside the wilderness. The general public would harvest as much as 2,000 cords of fuelwood from one non-commercial public cutting area over the next 50 years. However, 3,600 cords within the wilderness would not be available for harvest. The local demand would be readily supplied from other potential cutting areas outside the USA in the vicinity.

> Conclusion. Wilderness designation would reduce the harvest of fuelwood in the WSA by 3,600 cords. This local demand would be readily supplied from other local sources.

ALL WILDERNESS ALTERNATIVE (Gabbs Valley Range WSA)
79,600 Acres Suitable for Wilderness
0 Acres Nonsuitable for Wilderness

Under the All Wilderness Alternative, all 79,600 acres would be recommended suitable for wilderness designation; none would be recommended as suitable for multiple-use management.

The primary impacts of this alternative would relate to wilderness values, mineral development, motorized vehicle use, and fuelwood production.

Impacts on Wilderness Values

Wilderness designation would provide legislative protection to wilderness values in all 79,600 acres. Wilderness values of naturalness and opportunities for solitude and primitive and unconfined recreation would be retained in most of the WSA, because mineral exploration, fuelwood harvest, and motorized vehicle use would not be allowed to impact them.

Wilderness values would be impacted by the projected operation of three gold mines which would proceed on the basis of valid, existing rights. Even though wilderness designation would entail stricter monitoring for compliance, the impacts of mineral development would still occur.

An open-pit gold mining operation in the Petrified Wash area would disturb a total of 170 acres at the south side of and within the WSA. Ten miles of access roads 30 feet wide, the mine pit, leach pads and ponds, mine dumps, four miles of powerline with attendant roads, and three buildings would be sited on small ridgetops, sideslopes, and in minor ravines, all within the WSA. The disturbance would be visible, and the sounds of heavy machinery would occasionally be audible, from one to two miles away depending upon the surrounding terrain. No riparian sites would be affected. The appearance of naturalness and the opportunity for solitude within that space would be markedly reduced. This disturbance would not be noticeable from within the basin of Redrock Canyon, which contain the best wilderness values in the WSA, but it would be evident from the south side of the wilderness. The part of the wilderness south of Mount Ferguson would serve as a buffer between the mine in Petrified Wash and the wilderness values in Redrock Canyon.

An open-pit gold-mining operation near the Civit Cat Mine would disturb about 100 acres within the WSA at the southwestern edge. Two small mine pits, three miles of haul roads, plus waste dumps, drill pads, and staging areas would be constructed in two small canyons near the existing surface disturbance of Civit Cat Mine. No riparian sites would be affected. The impacts on the appearance of naturaless and opportunities for solitude and primitive and unconfined recreation would be confined to the immediate project location, because the ridges rimming the canyons would screen the disturbance from perception outside the site. The operation would have no effect on the wilderness values within the basin of Redrock Canyon.

An open-pit gold-mining operation at the northern end of the WSA near Poinsettia Spring Mine would cause about 70 acres of surface disturbance n low, rolling hills within the wilderness, based on valid, existing rights, in addition to 30 acres adjacent to the WSA. A 60-foot-wide road 0.7 miles long would be built around a 40-acre pit complex. Waste dumps would occupy an additional 40 acres. No riparian sites would be affected. The reduction in the appearance of naturalness and the opportunity for solitude would take effect in the wilderness within a two-mile radius of Poinsettia Spring Mine. The best wilderness values of the WSA within the basin of Redrock Canyon would not be at all affected by the operation.

Mining would disturb a total of 345 acres.

> Conclusion. Wilderness designation on 68,170 acres would preserve the area's overall natural condition and the best opportunities for solitude and primitive recreation. Legal protection would be afforded for the prominent features of Mount Ferguson and Redrock Canyon, along with Paint Rock Canyon and the moderately dissected desert landscapes on the northern side of the WSA. The only reduction in wilderness values would be due to the operation of three open pit mines which would be able to proceed on the basis of valid, existing rights, disturbing a total of 345 acres. No riparian sites would be affected.

Impacts on Mineral Development

Wilderness designation would prevent mineral exploration on 79,600 acres and 496 claims. This loss of opportunity would be balanced by the projected absence of an economically viable mineral resoures there. Three moderate-sized open-pit gold-mining operations would proceed on the basis of valid, existing rights.

> Conclusion. Wilderness designation would prevent mineral exploration on 79,600 acres and 496 mining claims. Three open-pit gold-mining operations would proceed.

Impacts on Motorized Recreation

Wilderness designation would close 79,600 acres of the WSA to motorized vehicle use, thus eliminating a current estimated 62 visitor-days of motorized recreation. Public land still open to such use would still offer abundant similar opportunities elsewhere in the vicinity and throughout the region. These other areas would absorb the use which would be foregone in the wilderness.

> Conclusion. About 62 visitor-days of motorized recreation would be foregone annually in the designated wilderness.

Impacts on Fuelwood Harvest

None of the 5,600 cords of pinyon pine and juniper potential fuelwood harvest would be realized from woodlands in the wilderness. However, other woodlands in the vicinity would readily supply the local public demand.

Conclusion. The potential 5,600-cord fuelwood harvest would be foregone in the WSA. Local demand would be readily supplied from other sources nearby.

BURBANK CANYONS WSA
(NV-030-525a)

PROPOSED ACTION (No Wilderness/No Action)
0 Acres Suitable for Wilderness
13,395 Acres Nonsuitable for Wilderness

Under the Proposed Action, none of the 13,395 acres in the Burbank Canyons WSA would be recommended as suitable for wilderness designation. All would be managed for multiple use.

The primary impacts under this alternative would relate to wilderness values and to the development of mineral resources. The entire area would be closed to motorized vehicle use, except for emergencies, for specific administrative needs, and where vehicle use is deemed warranted under an approved mining plan of operation. The WSA is already administratively designated a scenic area, which means that discretionary management actions would not be allowed which would not be compatible with management of the scenic resources there.

Impacts on Wilderness Values

Under the Proposed Action, none of the WSA would be designated wilderness, and none of the wilderness values on the 13,395 acres would receive the special legislative protection provided by wilderness designation. Mineral exploration activities on 47 unpatented mining claims would cause the most impacts to wilderness values in the Burbank Canyons WSA. Exploration activities would entail construction of roads, drill pads, drilling sumps, small trenches dug by backhoe, and larger bulldozed trenches. Annual aggregated surface disturbance would average ten acres per year, including four miles of constructed roadway 14 feet wide. Total disturbance would affect 500 acres. Most of these activities would be concentrated within the basin of Red Canyon at the north end of the WSA.

The effects of these exploration activities on wilderness values would be a decrease in naturalness and opportunities for solitude and primitive and unconfined recreation. While the ground actually disturbed would be about 10 acres annually, the reduction of the natural appearance would extend across

a half-mile strip parallel to Red Canyon creek at the northern edge of the WSA and the northwestern part of the WSA between the forks of Red Canyon. New roads and other signs of earth-moving would be plainly visible from the road in Red Canyon. Vegetation would be destroyed in the process, including four acres of riparian vegetation immediately adjacent to the road at the northern boundary. The sounds of heavy machinery and vehicles would not be constant but would occasionally be very obvious from the road.

Most of the exploration-related disturbance would occur in parts of the WSA not containing the best wilderness values of opportunity for solitude and primitive and unconfined recreation. The disturbance would not extend into the basin of Burbank Canyon, where the best wilderness values do occur. There the appearance of naturalness and the opportunity for solitude would not be affected. The aesthetic appearance and therefore the desirability of the basin area as an opportunity for primitive and unconfined recreation would not be affected.

The expansion of the Premier Mine into a daily subsurface gold-mining operation at the western edge of the WSA would disturb about 100 acres within the WSA. Development would include a 40-acre milling facility, one mile of access roads between existing adits, an additional three miles of access road in Red Canyon, powder magazines, and mine dumps. These would be sited on the ridgetop and on the sideslope between the ridge and Red Canyon. The disturbance would be visible, and the sounds of heavy machinery and vehicles would frequently be audible, from anywhere in a two-mile radius of the Premier Mine, and the road would be further visible from the bottom of Red Canyon. Large ore trucks would travel daily to and from the mine through Red Canyon. The appearance of naturalness and the opportunity for solitude would be markedly reduced in that area. Increased stream sedimentation and loss of an additional acre or riparian vegetation would occur along the upgraded road that presently lies adjacent to Red Canyon Creek. None of the disturbance would be noticeable from within Burbank Canyon, where the best wilderness values of the WSA are found.

An open-pit gold-mining operation at the southern edge of the WSA would expand and disturb 100 acres on the southern edge of the WSA. Developments near the existing San Juan/El Capitan Mine would include 70-acre mine pit, a 25-acre cyanide heap-leach facility, and a mile-long access/haul road leading to the main road in Rickey and Wedertz Canyons. These features would be audible and visible from one-half mile away on the ridgetop and just below the ridgetop to the south. The operation would also be visible from the top of the ridge between Burbank and Red Canyons. To that extent, the operation would reduce the appearance of naturalness and the opportunity for solitude. None of the disturbance would be noticeable from within Burbank Canyon, which contains the best wilderness values of the WSA. No riparian areas would be affected.

The underground mine on private land at the east side of the WSA would expand operations and cause disturbance on 100 acres within the WSA. A new access and haul road two miles long across a steep slope would be visible from Smith Valley. Two mine dumps on the east-facing slope would also be made of highly visible sidecast material. The overall appearance of naturalness would be lost in an area of one square mile around the mine and road. None of the disturbance would be noticeable from within Burbank Canyon, which contains the best wilderness values of the WSA. No riparian areas would be affected.

Conclusion. Mineral exploration and three gold-mining operations would disturb the wilderness values of naturalness and the opportunity for solitude in a total of 800 acres on all four sides of the WSA's periphery. Five acres of riparian area would be lost from the ecosystem. The area's best opportunities for solitude and primitive recreation--found in Burbank Canyon and characterized by steep canyons with riparian bottoms--would not be affected, because the anticipated disturbances would be screened from perception by the ridges surrounding the canyon.

Impacts on Mineral and Energy Development

All lands within the WSA would remain open for mineral entry. Potential mineral resources would be available for exploration and development. Exploration would resume on 47 mining claims. Three moderate-sized open-pit gold-mining operations would proceed as described under the Proposed Action.

Conclusion. There would be no impact on exploration for or the development of mineral resources.

RELATIONSHIP BETWEEN LOCAL SHORT-TERM USES OF MAN'S ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

Long-term productivity would be maintained and not significantly reduced by the projected mineral exploration and expansion of mining. Visual evidence of surface disturbances would remain indefinitely but would be confined to sites which would not alter the landscape character as a whole.

IRREVERSIBLE AND IRRETRIEVALBE COMMITMENTS OF RESOURCES

Sites projected to be disturbed by development of mineral resources would be committed irreversibly and irretrievably to mining. These sites would not be so expansive that they would dominate the landscape character of the entire WSA, and the commitments of resources would be largely restricted to those local sites. However, wilderness values would gradually and substantially be diminished except in Burbank Canyon, where the best of these values are found.

PARTIAL WILDERNESS ALTERNATIVE (Burbank Canyons WSA)
9,970 Acres Suitable for Wilderness
3,425 Acres Nonsuitable for Wilderness

Under Partial Wilderness Alternative, 9,970 acres would be recommended suitable for wilderness designation. The remaining 3,425 acres would not be recommended suitable for wilderness designation and would be managed for multiple use.

The primary impacts of this alternative relate to wilderness values and development of mineral resources.

Impacts on Wilderness Values

Wilderness designation on 9,970 acres would provide legislative protection for the best wilderness values of the WSA in Burbank Canyon Surface disturbing activities associated with mineral exploration and motorized recreation would not be allowed to take place. The values of naturalness and opportunities for solitude and primitive and unconfined recreation would be preserved in perpetuity within the 9,970 acres, except where affected by development of mineral resources that would proceed on the basis of valid, existing rights.

In the remaining 3,425 acres managed for multiple use, exploration for and development of mineral resources would be resumed. Exploration activities would entail construction of roads, drill pads, drilling sumps, small trenches dug by backhoe, and larger bulldozed trenches. Annual aggregated surface disturbance would average 5 acres per year, including 2 miles of constructed roadway 14 feet wide. Total disturbance would affect 250 acres. Most of these activities would be concentrated between the forks of Red Canyon in the northwest part of the WSA.

The effects of these exploration activities on wilderness values would be a decrease in naturalness and opportunities for solitude and primitive and unconfined recreation. While the ground actually disturbed would be about 5 acres annually, the reduction of the natural appearance would extend across the areas between the forks of Red Canyon in the northwest part of the WSA. New roads and other signs of earth-moving would be plainly visible within this parts of the WSA. Vegetation would be destroyed in the process, including four acres of riparian vegetation immediately adjacent to the northern boundary road. The sounds of heavy machinery and vehicles would not be constant but would occasionally be very obvious.

The exploration-related disturbance would occur in a part of the WSA not containing the best wilderness values of opportunity for solitude and primitive and unconfined recreation.

The expansion of the Premier Mine into a daily subsurface gold-mining operation at the western edge of the WSA would disturb about 100 acres within the WSA but outside the wilderness. Development would include a 40-acre milling facility, one mile of access roads, between existing adits, an additional three miles of access road in Red Canyon, powder magazines, and mine dumps. These would be sited on the ridgetop and on the sideslope between the ridge and Red Canyon. The disturbance would be visible, and the sounds of heavy machinery and vehicles would frequently be audible, from anywhere in a two-mile radius of the Premier Mine, and the road would be further visible from the bottom of Red Canyon. Large ore trucks would travel daily to and from the mine through Red Canyon. The appearance of naturalness and the opportunity for solitude would be markedly reduced in that area. Increased stream sedimentation and loss of an additional acre of riparian vegetation would occur along the upgraded road that presently lies adjacent to Red Canyon Creek. None of the disturbance would be noticeable from within Burbank Canyon, where the best wilderness values of the WSA are found.

An open-pit gold-mining operation at the southern edge of the WSA would expand and disturb 100 acres on the southern edge of the WSA. Developments near the existing San Juan/El Capitan Mine would include 70-acre mine pit, a 25-acre cyanide heap-leach facility, and a mile-long access/haul road leading to the main road in Rickey and Wedertz Canyons. These features would be audible and visible from one-half mile away on the ridgetop and just below the ridgetop to the south. The operation would also be visible from the top of the ridge between Burbank and Red Canyons. To that extent, the operation would reduce the appearance of naturalness and the opportunity for solitude. None of the disturbance would be noticeable from within Burbank Canyon, which contains the best wilderness values of the WSA. No riparian areas would be affected.

The underground mine on private land at the east side of the WSA would expand operations and cause disturbance on 100 acres within the WSA. A new access and haul road two miles long across a steep slope would be visible from Smith Valley. Two mine dumps on the east-facing slope would also consist of highly visible sidecast material. The overall appearance of naturalness would be lost in an area of one square mile around the mine and road. None of the disturbance would be noticeable from within Burbank Canyon, which contains the best wilderness values of the WSA. No riparian areas would be affected.

> Conclusion. Wilderness designation would preserve the area's best opportunities for solitude and primitive recreation in Burbank Canyon, which is characterized by steep canyons with riparian bottoms. The three gold-mining operations and limited exploration would eliminate the wilderness values of naturalness and any opportunity for solitude in a total of 550 acres on three sides of the WSA's periphery. Five acres of riparian vegetation would be lost from the ecosystem. The anticipated disturbances would be screened from perception in the wilderness by the ridges surrounding the canyon.

Impacts on Mineral and Energy Development

The 9,970 acres designated wilderness would be closed to all mineral entry and mineral leasing. Mineral exploration would be prevented. Three moderate-sized open-pit gold-mining operations would proceed as described under the Proposed Action, either outside the wilderness or on the basis of valid, existing rights.

> Conclusion. Exploration for mineral resources would be prevented on 9,970 acres. Three gold-mining operations would proceed.

ALL WILDERNESS ALTERNATIVE (Burbank Canyons)
13,395 Acres Suitable for Wilderness
0 Acres Nonsuitable for Wilderness

Under this alternative, the entire 13,395 acres of the Burbank Canyons WSA would be recommended as suitable for wilderness designation. None would be recommended as suitable for multiple-use management. No mineral exploration would be allowed, but three gold mines would still disturb a projected 300 acres yearly in the wilderness, based on the demonstration of valid, existing rights, regardless of wilderness designation.

The primary impacts under this alternative relate to wilderness values and mineral values.

Impacts on Wilderness Values

Under the All Wilderness Alternative, all 13,395 acres of the Burbank Canyons WSA would be designated wilderness. All wilderness values within the WSA would receive special legislative protection provided by wilderness designation. Wilderness values of naturalness, opportunities for solitude and primitive and unconfined recreation, and special features described in Chapter 3 would be retained except where affected by development of mineral resources that would still proceed on the basis of valid, existing rights. Wilderness values in the entire WSA would be protected from impairment by any mineral exploration activities.

The expansion of the Premier Mine into a daily subsurface gold-mining operation at the western edge of the WSA would still disturb about 100 acres within the WSA but outside the wilderness. Development based on valid, existing rights would include a 40-acre milling facility, one mile of access roads, between existing adits, an additional three miles of access road in Red Canyon, powder magazines, and mine dumps. These would be sited on the ridgetop and on the sideslope between the ridge and Red Canyon. The disturbance would be visible, and the sounds of heavy machinery and vehicles would frequently be audible, from anywhere in a two-mile radius of the Premier Mine, and the road would be further visible from the bottom of Red Canyon. Large ore trucks would travel daily to and from the mine through Red Canyon. The appearance of naturalness and the opportunity for solitude would be markedly reduced in that area. The road construction would increase stream sedimentation and destroy one acre of riparian vegetation. None of the disturbance would be noticeable from within Burbank Canyon, where the best wilderness values of the WSA are found.

An open-pit gold-mining operation at the southern edge of the WSA would expand into the wilderness based on valid, existing rights and disturb 100 acres on the southern edge of the WSA. Developments near the existing San Juan/El Capitan Mine would include 70-acre mine pit, a 25-acre cyanide heap-leach facility, and a mile-long access/haul road leading to the main road in Rickey and Wedertz Canyons. These features would be audible and visible from one-half mile away on the ridgetop and just below the ridgetop to the south. The operation would also be visible from the top of the ridge between Burbank and Red Canyons. To that extent, the operation would reduce the appearance of naturalness and the opportunity for solitude. None of the disturbance would be noticeable from within Burbank Canyon, which contains the best wilderness values of the WSA. No riparian areas would be affected.

The underground mine on private land at the east side of the WSA would expand operations into the wilderness based on valid, existing rights and cause disturbance on 100 acres within the WSA. A new access and haul road two miles long across a steep slope would be visible from Smith Valley. Two mine dumps on the east-facing slope would also consist of highly visible side-cast material. The overall appearance of naturalness would be lost in an area of one square mile around the mine and road. None of the disturbance would be noticeable from within Burbank Canyon, which contains the best wilderness values of the WSA. No riparian areas would be affected.

> Conclusion. Wilderness designation would preserve the area's best opportunities for solitude and primitive recreation in Burbank Canyon, which is characterized by steep canyons with riparian bottoms. Three gold-mining operations would eliminate the wilderness values of naturalness and the opportunity for solitude in a total of 300 acres on three sides of the WSA's periphery. One acre of riparian vegetation would be lost from the ecosystem. The projected disturbances would be screened from perception in the wilderness by the ridges surrounding the canyon.

Impacts on Mineral Development

The 13,395 acres designated wilderness would be closed to all mineral entry and mineral leasing. Mineral exploration would be prevented. Three moderate-sized open-pit gold-mining operations would proceed as described under the Proposed Action, either outside the wilderness or on the basis of valid, existing rights.

> Conclusion. Exploration for mineral resources would be prevented on 13,395 acres. Three gold-mining operations would proceed.

CHAPTER FIVE

CONSULTATION AND COORDINATION

CHAPTER 5

CONSULTATION AND COORDINATION

PUBLIC INVOLVEMENT

Public involvement steps in the wilderness program began in the summer of 1978 and continues. The decision to initiate a Resource Management Plan including consideration of wilderness study areas and to prepare an EIS on the Walker Resource Area was published in the Federal Register on March 31, 1983, and announced by mail to all interested parties.

The scoping process for the RMP/EIS involved several phases, extending from the summer of 1978 to January, 1985.

The process leading up to the Final EIS has included numerous opportunties for public involvement. Consultation and coordination with the public and governmental agencies was a planned and integral part of the development of the management alternatives analyzed in the draft and final EIS. Following is a summary of the consultation, coordination, and public participation in the EIS process:

- Initial wilderness inventory and public comment period--1978-1979.

- Intensive wilderness inventory and public comment period--1979-1980.

- A Notice of Intent to prepare the Walker Resource Area Management Plan/EIS was published in the Federal Register on March 31, 1983.

- April 7, 1983, news releases and letters were issued to all interested parties, asking for input on issues and concerns to be addressed in the Walker RMP/EIS. A total of 27 written comments were received by May 20, 1983.

- April 28, 1983, BLM representatives met with concerned citizens in Hawthorne, Nevada, to solicit comments.

- Bureau officials met with county commissions, the Carson City District Advisory Council, and the Carson City District Grazing Advisory Board during the scoping period to brief them and hear their concerns.

- On August 16, 1983, a letter was sent out to the public requesting comment on draft planning criteria which guide the planning process. A total of 13 responses was received, generally favorable.

- May 10, 1984, news releases and letters to media and interested parties were mailed, opening a 30-day period to receive comments on preliminary alternatives to be considered in the RMP/EIS. An open house for receipt of comments was held in Hawthorne on May 24th. Oral as well as written comments received throughout the planning process were used in the final development of alternatives analyzed in the Draft EIS. These comments are on file and available for public review in the BLM Carson City District Office.

A Notice of Availability of the Walker Draft RMP/EIS was published in the Federal Register on October 10, 1984, and was filed with the Environmental Protection Agency on October 18, 1984, thus opening a public comment period ending on January 25, 1985.

Public hearings were scheduled for December 4, 1984, in Reno, Nevada and December 5, 1984, in Hawthorne, Nevada. These were announced in the Federal Register notice, as well as through news releases to local newspapers and in a letter accompanying each Draft RMP/EIS mailed out to the public.

A total of 61 persons attended the two hearings, twelve making oral presentations in Reno and seven in Hawthorne. Letters of comment on the RMP including comments pertaining to wilderness as an issue, were received ftom 82 persons and organizations and published in the Walker Resource Area Final RMP/EIS. Letters of comment referring to wilderness as an issue are also reproduced later in this chapter of the FEIS.

Transcripts of the public hearings are available for inspection at the Carson City Distsrict Office, 1050 E. William, Suite 335, Carson City, Nevada.

The Final Walker Resource Management Plan and Environmental Impact Statement was published on July 5, 1985.

CONSISTENCY WITH OTHER PLANS

No inconsistencies exist between the designation of an area as wilderness and the officially approved and adopted resource related plans of other federal agencies, state and local governments, or Indian tribes.

Governor Richard H. Bryan, offering the consensus position for the State Departments of Agriculture, Conservation and Natural Resources, Minerals, and Wildlife, supports the Proposed Action for both of the WSAs.

The Mineral County Commissioners have passed a resolution stating that they believe no lands within the county are suitable for designation as wilderness. In meetings with BLM officials, they expressed opposition to wilderness in the Gabbs Valley Range.

The Lyon and Douglas County Commissioners were briefed on the Proposed Action regarding the Burbanks Canyons WSA, and neither body expressed objection to or support for wilderness there.

Representatives of four Native American groups in the area have been invited to comment and to attend public meetings during the review process. The Bureau knows of no conflicts between wilderness designation and Native American traditional or religious uses of the land.

DISTRIBUTION OF THE DRAFT EIS

The Walker Draft Resource Management Plan and Environmental Impact Statement (RMP/EIS) was mailed to 400 agencies, organizations, companies, and individuals who indicated an interest. Copies of the Draft RMP/EIS were made available for public review at all BLM district offices in Nevada, at the BLM Nevada State Office and Washington, D.C. office, at the Nevada State Library and public libraries within the Walker Resource Area, and in University of Nevada libraries. The Draft RMP/EIS and the Walker Wilderness Technical Report were both available to the public upon request from the Carson City District Office.

The Draft RMP/EIS was mailed to numerous governmental agencies and organizations for comment. These included, but were not limited to, the following:

Federal

Department of Agriculture
  Forest Service
  Soil Conservation Service
Department of Defense
Department of Energy
Department of the Interior
  Bureau of Indian Affairs
  Bureau of Mines
  Bureau of Reclamation
  Fish and Wildlife Service
  National Park Service
  Geological Survey
Department of Transportation
Environmental Protection Agency

State

Office of the Governor, Nevada
Nevada State Clearinghouse (includes State Historic Preservation Officer and State Agencies)
State Multiple Use Advisory Committee
State Oil and Gas Mining Advisory Board
State Bureau of Mines and Geology

Indian Tribes

Walker River Paiute Tribal Council
Fallon Paiute Shoshone Business Council
Intertribal Council of Nevada
Yerington Paiute Tribe

Congressional

Senator Chic Hecht
Senator Paul Laxalt
Congresswoman Barbara Vucanovich

State Legislators

Assemblyman Joseph E. Dini, Jr.
Assemblyman Kenneth Redelsperger
Senator Lawrence Jacobsen
Senator Richard Blakemore

Local

Lyon County Commissioners
Mineral County Commissioners
Mineral County Planning Commission
Douglas County Manager
Douglas County Commissioners

PUBLIC COMMENTS ON THE DRAFT EIS

The following persons and organizations submitted comments specific to the wilderness issue in the Walker Draft RMP/EIS:

Comment Letter	Name	Page
1	U.S. Environmental Protection Agency	5-6
2	U.S. Fish and Wildlife Service	5-9
3	U.S. Bureau of Mines	5-10
4	U.S. Geological Survey	5-10
5	U.S. National Park Service	5-11
6	Department of the Air Force	5-12
7	Governor of Nevada's Concensus Position	5-13
8	Dorothy Legarreta	5-14
9	The Wilderness Society	5-15
10	Fisher-Watt Mining Co., Inc.	5-17
11	Coeur Explorations, Inc.	5-18
12	Wild Horse Organized Assistance	5-19
13	California Association of 4WD Clubs, Inc.	5-21
14	Women in Mining	5-21
15	Sierra Club--Rose Strickland	5-22
16	Sierra Club--Marjorie Sill	5-25
17	Reed Secord	5-26
18	B. DeGonia	5-27
19	J. R. Swanson	5-28
20	David A. Hornbeck	5-29
21	Combined Metals Reduction Co.	5-31
22	Paul Clifford	5-32
23	John Hart	5-35
24	Hopkins R. Fitzpatrick	5-36

Testimony presented at hearings in Reno and Hawthorne, Nevada, relative to the wilderness issue has been extracted from the official hearing records.

Testimony	Name	Page
1-2 (Reno)	Charles Watson	5-37
3 (Hawthorne)	Robert Warren	5-38

The comments are reproduced on the pages that follow, along with Bureau responses.

Comment Letter 1

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca. 94105

January 25, 1985

Edward F. Spang
State Director
Bureau of Land Management
300 Booth Street
P.O. Box 12000
Reno, Nevada 89520

Dear Mr. Spang:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) titled RESOURCE MANAGEMENT PLAN, WALKER PLANNING AREA; MINERAL, LYON AND DOUGLAS COUNTIES, NEVADA. We have the enclosed comments regarding this DEIS.

We have classified this DEIS as Category EC-2, Environmental Concerns - Insufficient Information (see attached "Summary of Rating Definitions and Follow-Up Action"). This DEIS is rated EC-2 because: 1) description and protection measures for some water bodies and riparian vegetation were not adequate, 2) air quality and potential air impacts were either omitted or briefly discussed, 3) sections of the DEIS dealing with herbicides need to be expanded and 4) the rationale for recommending no wilderness study areas is unclear, especially when the Preferred Alternative is compared to Alternatives C and D. The classification and date of EPA's comments will be published in the Federal Register in accordance with our public disclosure responsibilities under Section 309 of the Clean Air Act.

We appreciate the opportunity to review this DEIS. Please send four copies of the Final Environmental Impact Statement (FEIS) to this office at the same time it is officially filed with our Washington, D.C. office. If you have any questions, please contact Patrick J. Cotter, Federal Activities Branch, at (415) 974-0948 or FTS 454-0948.

Sincerely yours,

Charles W. Murray, Jr.
Assistant Regional Administrator
for Policy and Management

Enclosure

Comment Letter 1

-1-

Water Quality Comments

1. The FEIS should contain strong commitments for protection and enhancement of the beneficial uses and water quality in all major streams of the resource area.

   a. Mitigation and protection, in the form of fencing to exclude livestock, is highly recommended for perennial streams, such as Rough Creek and Robin Creek, or streams that are impacted by fecal contamination and total dissolved solids, such as Red Canyon Creek and Rough Creek (p. 3-31).

   b. The FEIS should identify and discuss other thermal springs, such as Blue Link Spring, which may contain rare, threatened or endangered species. For those additional thermal springs where sensitive species were identified, appropriate mitigation measures should be proposed to protect the critical habitat.

2. Riparian vegetation in the resource area is described as a "unique form of plant community" that provides a "fragile interface" between the desert and the stream communities. Riparian communities provide shade for fish that inhabit the streams of this region. Protection of the fisheries resources is one of the beneficial uses of the streams that should be mitigated in the management plan.

1-1 EPA recommends that the FEIS include a map depicting the location of the 103 riparian communities (p. 4-47) and those highlighted in Table 3-5. Accompanying information should include acreage, areas currently protected, and areas to be protected under each alternative. A discussion of BLM's reasons for not including the remaining riparian acreage in a mitigation proposal should also be presented. The mitigation proposal should include fencing and rotational grazing management, among other means, to allow the sensitive riparian communities to recover from grazing activities (p. 2-19).

Air Quality Comments

1. EPA's scoping letter, dated May 16, 1983, recommended that the DEIS should:

   a. Describe existing air quality conditions in the resource area in terms of the National Ambient Air Quality Standards (NAAQS),

   b. Identify impacts to air quality as a result of any of the alternatives,

Comment Letter 1

c. Present mitigation measures which will be implemented to protect air quality.

The DEIS contained no such information.

2. The standard operating procedures listed in the DEIS indicate that "air quality will be protected...(according to) Nevada Ambient Air Quality Standards" (p. 2-28). Priority pollutant concentrations, particularly carbon monoxide (CO) and total suspended particulates (TSP), can increase substantially in a localized area during ORV events. These impacts need to be addressed in the FEIS.

1-2 3. EPA recommends analysis of potential air quality impacts, site specific and/or cumulative, for the following subjects:

a. Exploration and development of natural resources, including mining, geothermal and petroleum operations;

b. ORV uses (p. 2-22 and 3-28);

c. Construction and maintenance of roads and right-of-way corridors (p. 2-30 and 2-31);

d. Wind erosion impacts.

Pesticide Comments

1. The DEIS contains a single statement that mentions the use of herbicides as a tool for managing overgrowth of vegetation (p. 2-28). EPA recommends expanding this
1-3 discussion to include the location of herbicide spraying activities, acreage to be treated, target species and ensuing environmental impacts to flora and fauna in the areas to be sprayed.

2. The FEIS should list all herbicides to be used in the resource area. The application of herbicides must conform to all Federal and state regulations. BLM should review current litigation and court decisions related to each herbicide listed for possible use in the resource area. A recent U.S. Supreme Court decision upholding the ruling of the U.S. Court of Appeals for the 9th Circuit, regarding herbicide worst case studies, could affect spraying and application of herbicides on BLM lands in Nevada.

Wilderness Study Area (WSA) Comments

In general, EPA recommends a reevaluation of Alternative B, the Preferred Alternative, to include portions of the WSAs listed as suitable for Alternatives C and D.

Response 1

All of the comments pertaining to the Walker Resource Area as a whole were responded to in the Final EIS for the Walker Resource Management Plan.

1-1 While this comment applies to the issue of grazing throughout the Walker Resource Area, it emphasizes the importance of riparian areas and their many values. Therefore, this wilderness FEIS also addresses the subject of riparian areas as a special feature of wilderness values where appropriate.

1-2 As indicated in the FEIS, mining operations would be the primary potential sources of air pollutants in the Gabbs Valley Range and Burbank Canyons WSAs. The Nevada Division of Environmental Protection regulates such activities with regard to maintaining air quality standards. No ORV events are anticipated within either WSA.

1-3 No use of herbicides is anticipated in either WSA.

Comment Letter 1

1. Table 1 (below) shows the disposition of acreage for each of the WSAs in Alternatives B, C and D. The designation of zero acres of suitable WSA in the Preferred Alternative is unclear when Alternative C, the Development Alternative, has 9,970 acres of Burbank Canyon and 27,860 acres of the Gabbs Valley Range declared as suitable for wilderness. The FEIS should reevaluate Alternative B to include at least as much wilderness area as Alternative C or present a detailed discussion about the nonsuitable nature of these areas.

Table 1. Summary of WSA Acreage

WSA	Total Acreage[1]	Presently Used[2]	Available Acreage[3]	Suitable Acreage Alt. B[4]	Alt. C[5]	Alt. D[6]
Burbank Canyons	13,395	2,197	11,198	0	9,970	9,970
Gabbs Valley Range	79,600	8,801	70,799	0	27,860	68,170

1) p. 2-15, Alternative E (All Wilderness Alternative)
2) Table 3-9
3) Total Acreage minus Present Use
4) p. 2-5, Alternative B (Preferred Alternative)
5) p. 2-9, Alternative C (Development Alternative)
6) p. 2-13, Alternative D (Wilderness Enhancement Alternative)

2. BLM should make all efforts to protect the beneficial uses of the East Walker River including irrigation, livestock watering, aquatic life and wildlife propagation, municipal and industrial uses, domestic water supply, recreation and body contact. Optimal flows should be determined to protect the water quality and beneficial uses of the river.

Comment Letter 2

UNITED STATES GOVERNMENT

Memorandum

FISH AND WILDLIFE SERVICE
GREAT BASIN COMPLEX
4600 Kietzke Lane, Bldg. C
Reno, Nevada 89502

TO: District Manager, Bureau of Land Management, Carson City, Nevada

DATE: January 24, 1985

FROM: Acting Complex Manager, Reno, Nevada

SUBJECT: Comments on the Draft Walker Resource Management Plan and Environmental Impact Statement, Walker Resource Area

We have the following comments and recommendations regarding the subject Plan and Environmental Impact Statement:

1. For Alternative B, we are assuming that the 27 riparian areas recommended for protection are currently heavily grazed. On Page 3-13 of the Resource Management Plan (RMP) 50 riparian areas are said to be heavily utilized by livestock at present. We recommend that as many as possible of these 50 areas be protected from heavy grazing. Protection measures should include either complete fencing of the riparian areas with adjacent livestock water troughs, or partial fencing with livestock access to isolated stream reaches. It should be noted that fencing may only be necessary for a few years at a time in some locations.

2. Although Alternative C is geared towards production of commercial uses, we recommend that at least 27 of the 50 currently heavily grazed riparian areas be protected against livestock grazing using the measures discussed above.

3. The East Walker River is one of the more outstanding remaining natural river systems in the Great Basin (Page 3-39 of RMP). It supports riparian habitat and a sport fishery. We recommend that 4,300 acres along this river be designated as an Area of Critical Environmental Concern (ACEC) and withdrawn from mineral entry.

4. On Page 4-17 of the RMP it was noted that, for Alternative B, 3 miles of fishable rivers and creeks would remain unprotected. Why is this the case? We recommend that these 3 miles be protected from livestock grazing.

2-1 5. Alternative B, which should provide for an optimum mix of natural and commercial resource uses, recommends no Wilderness Study Areas (WSAs) as suitable for designation. Alternative C which is oriented towards production of commerical resources recommends 39 percent of the total acreage of WSAs for wilderness designation. Why are there no WSAs recommended for designation in Alternative B?

As noted on Page 4-17 of the RMP the non-designation of the Burbank Canyons WSA could have a major negative impact on fisheries habitat in Red Canyon Creek which supports a population of brook trout. We recommend that the entire 13,395 acres of this WSA be recommended as suitable for Wilderness designation

Comment Letter 2

to protect the fishery and associated riparian habitat from the effects of mining activities. We also support establishment of the Gabbs WSA for Wilderness designation; however, it is assumed that since grazing will continue, wildlife management activities and development will also continue in the WSAs.

6. Provisions of Alternative C are for a 10% decrease in wild horse and burro numbers and elimination of all livestock grazing. Correspondingly, it would be expected that wildlife habitat would be managed for more than the recommended 41% increase over current levels. This is the same level as for Alternatives B & D which would be managed to include livestock grazing. Please explain this apparent discrepancy.

The preferred Alternative B appears acceptable provided that the above-discussed provisions regarding riparian habitat (Items 1, 3, 4, and 5 above) are included in the Final Resource Management Plan and Record of Decision.

Thank you for the opportunity to comment.

Robert J. Stallcup

CC: Nevada Department of Wildlife, Reno and Fallon, Nevada

Response 2

2-1 No WSAs were recommended for designation in Alternative B because it was determined that other values were higher than wilderness values.

Comment Letter 3

United States Department of the Interior

BUREAU OF MINES

1084 SUPERIOR FIELD OPERATIONS CENTER
EAST 360 3RD AVENUE
SPOKANE, WASHINGTON 99202

November 25, 1986

Memorandum

To: James W. Elliott, District Manager--Carson City District Office, Bureau of Land Management, Carson City, Nevada

From: Supervisor--Minerals Involvement Section, Branch of Engineering Studies

Subject: Review of Draft Resource Management Plan and Environmental Impact Statement for the Lahontan and Walker Resource Areas, Nevada

We have reviewed the Resource Management Plan and Environmental Impact Statement (RMP/EIS) for both the Lahontan and Walker Resource Areas.

We have no comments on either RMP/EIS.

for

D'Arcy P. Banister

Comment Letter 4

United States Department of the Interior

GEOLOGICAL SURVEY
RESTON, VA 22092

In Reply Refer To:
WGS-Mail Stop 423

DEC 03 1986

Memorandum

To: District Manager, Carson City District Office, Bureau of Land Management Carson City, Nevada

From: Chief, Environmental Affairs Program

Subject: Review of final wilderness environmental statements for the Walker and Lahontan planning units

We are responding to your request of November 17 for comments on these resource management plans.

We reviewed the drafts of these plans and found that we had no comments.

Sincerely,

Clifford A. Haupt

Clifford A. Haupt
Chief, Environmental Affairs Program

Comment Letter 5

United States Department of the Interior

NATIONAL PARK SERVICE

WESTERN REGION

450 GOLDEN GATE AVENUE, BOX 36063

SAN FRANCISCO, CALIFORNIA 94102

IN REPLY REFER TO:

L7619 (WR-RPE)

December 5, 1984

Memorandum

To: District Manager, Bureau of Land Management, Carson City

From: ACTING Regional Director, Western Region

Subject: Draft Walker Resource Management Plan and Environmental Impact Statement

In accordance with the State Director, Bureau of Land Management, Nevada, letter of October 10, 1984, we have reviewed the subject document and have the following comments.

1) The DEIS devotes considerable time and discussion to various environmentally sensitive topics (e.g., range management, vegetation, soils, wild horses/burros, etc.), however, the discussion of cultural resources by comparison is brief, superficial and weak. Moreover, the Chapter V - List of Preparers does not acknowledge input by the BLM Carson City District archeologist(s).

The Chapter 6 - Consultation does not acknowledge any input regarding cultural resources nor does it indicate under "Availability of Report" that any comments were solicited from the Nevada State Museum, the State Historic Preservation Office, the University's Department of Anthropology at Reno, or local archeologists and historians of which there are many in the DEIS area of concern. Similarly, the References section does not cite any archeological surveys or archeological literature.

2) Chapter 2 (page 2-27) indicates, to some extent, BLM's awareness that historic preservation laws and regulations do exist but there is no followup discussion of the compliance process. A reference is made to the effect "Class III inventories" will be conducted prior to any action taken. The Class III inventory should be defined in detail.

Page 2-27 also notes that the "public review process is outlined in Chapter V; however, it is reviewed in Chapter VI.

3) Chapter 3, page 3-27: A number of known site types are listed; however, what do we know about the density, distribution, and significance of the known cultural sites? A one sentence paragraph on page 3-39 indicates one site, the East Walker River Petroglyph Site, is on the National Register or Historic Places. Obviously, many more of the known sites are potentially eligible for nomination to the National Register.

Comment Letter 5

4) Discussions of cultural resources in the document suffer from clumsy and/or meaningless language. For example, the following statement appears on page 4-51:

> "Land exchanges, miscellaneous land actions and development of range and wildlife improvements would be mitigated under normal cultural resources measures." (See also a similar statement on page 4-53).

How are land exchanges, or range and wildlife improvements mitigated? What are "normal cultural resources protection measures"? Is the Section 106 process and consultation with the SHPO being referred to? If so, please specify. To comply with Section 106 of the National Historic Preservation Act and Executive Order 11593, the BLM and the SHPO should make a formal determination of effect (36 CFR 800.4) regarding potential impacts for each of the proposed alternative actions (A through E) and develop a compliance plan for mitigating specific adverse impacts for the alternatives.

We appreciate the opportunity to comment on the Plan and EIS.

W. Russell Wirth

cc:
WASO (762)
IAS

Comment Letter 6

DEPARTMENT OF THE AIR FORCE
REGIONAL CIVIL ENGINEER, WESTERN REGION (AFESC)
630 SANSOME STREET - ROOM 1316
SAN FRANCISCO, CALIFORNIA 94111

REPLY TO ATTN OF: RDV (Cox/556-6439)

SUBJECT: Walker Planning Area Draft Resource Management Plan (RMP) and Environmental Impact Statement (EIS), your letter dated 19 October 1984

TO: Department of the Interior
Bureau of Land Management
Nevada State Office
Mr. Edward F. Spang
State Director
300 Booth Street
P.O. Box 12000
Reno, Nevada 89520

1. We appreciate the opportunity to comment on the subject RMP and EIS and we offer the following comments:

6-1 a. As you are aware, some of the Walker Planning Area has historically been subject to military overflights which should continue in the future. In the past, there have not been any problems between the Air Force and the Bureau of Land Management concerning potential conflicts between military overflights and management plans. We, therefore, concur with any of the alternatives your agency designates, provided no restrictions are placed on military overflights in wilderness areas.

b. There are certain aspects of the alternatives mentioned which we would be less inclined to support because areas which are appropriate for military overflights are becoming increasingly rare. Desirable characteristics include: relatively isolated locations of sparse populations, areas presently under federal jurisdiction, diverse topography, and areas which lack heavy commercial activities such as mining.

2. Therefore, the Air Force would be more inclined to support the alternative (Alternative D) that provides for the maximum amount of wilderness designation. This support would be based on the condition that no restrictions are placed on military overflights.

3. We appreciate this opportunity to comment on the RMP and EIS concerning the RMP and Walker Planning Area. We consider lands within the Walker Planning Area to be a valuable resource and overflights, to a certain degree,

Comment Letter 6

a compatible use of that resource. If, however, this use is determined to be a conflict because of frequency, noise levels or duration of overflights, we hope you will feel free to contact our office to discuss these concerns. Our staff point of contact is Mr. William Cox, (415) 556-6439.

ROBERT E. CAMERON, Acting Chief
Environmental Planning Division

cc: AF/LEEVX
AFESC/DEVN

Response 6

6-1 This information is included in the FEIS.

Comment Letter 7

STATE OF NEVADA

RICHARD H. BRYAN
Governor

LINDA A. RYAN
Director

STATE OFFICE OF COMMUNITY SERVICES
Capitol Complex
Carson City, Nevada 89710
(702) 885-4420

May 13, 1985

Mr. Tom Owen, District Manager
Carson City District Office
Bureau of Land Management
1050 E. William Street
Carson City, Nevada 89710

Re: Governor's Consistency Review, SAI NV #85300020

Dear Mr Owen:

The State of Nevada has reviewed the Preliminary Final Resource Management Plan and Environmental Impact Statement for the Walker Resource Area. Our position on the two wilderness areas (NV-030-526A and NV-030-407) has not changed, as we continue to recommend the Bureau's preferred alternative. In reference to other resource concerns, we have attached the comments of the Nevada Department of Agriculture and the Division of State Parks. We also acknowledge your receipt of comments of the Nevada Department of Wildlife.

We would appreciate your consideration of State Agency comments in your decision process. Please feel free to contact us if you need additional information or state input on the Walker Resource Area.

Sincerely,

Linda A. Ryan
Director

LAR/kw

G-13

Comment Letter 7

STATE OF NEVADA

RICHARD H. BRYAN
Governor

LINDA A. RYAN
Director

STATE OFFICE OF COMMUNITY SERVICES
Capitol Complex
Carson City, Nevada 89710
(702) 885-4420

January 25, 1985

Mr. Tom Owen, District Manager
Carson City District Office
Bureau of Land Management
1050 E. William Street
Carson City, Nevada 89701

Re: Governor's Consensus Position, SAI NV #85300020

Dear Mr. Owen:

The State of Nevada has reviewed the Draft Resource Management Plan and Environmental Impact Statement for the Walker Planning Area, and has developed the following position with respect to the wilderness study areas.

There are two wilderness study areas in the Walker Planning Area: The Burbank Canyons (NV-030-526A) and the Cabbs Valley Range (NV-030-407). Under the Bureau's preferred alternative, both areas would be recommended as not suitable for wilderness designation. The State concurs with this recommendation.

With respect to the Burbank Canyons Wilderness Study Area, in the Pine Nut Mountains, we note especially the existing roads, private inholdings, and the extensive mining activity along the borders of the area. Historical activity has included considerable mining of silver and gold, with some copper mining activity. We also note the geothermal potential along the eastern boundary of the Wilderness Study Area near Hind's (Nevada) Hot Springs.

The Cabbs Valley Range Wilderness Study Area is also heavily mineralized. This area is noted for past production of mercury, gold, lead, copper and tungsten. There are presently more than 300 mining claims in the Wilderness Study Area, most of which have been staked in the last five years. Other human intrusions into the Wilderness Study Area include roads, private inholdings, and livestock developments.

Comment Letter 7

Mr. Tom Owen
January 25, 1985
Page 2

While both areas include scenic resources of considerable value, neither appears suitable for wilderness designation.

Thank you for the opportunity to review and comment on this study. Please feel free to contact us if you need additional information about either of these areas.

Sincerely,

Linda A. Ryan
Director

LAR/ll

Comment Letter 8

1-15-85

Dear Mr. Owen

As a resident with my nose checked of the Lake Tahoe Basin during the past 30 summers + frequent user of the wilderness areas in Nevada, I protest the BLM's designation of only one Wilderness Study Area at Stewart - completely omitting Burbank Canyon + Gabbs Valley. I also understand your agency did not consider the important riparian issues for the Walker River. I + my children - now adult hikers - urge you + your agency to reconsider.

Sincerely,

Dorothy Lequerica PhD
Adjunct Professor of Basque Studies
UN-Reno

Comment Letter 9

THE WILDERNESS SOCIETY

FOUNDED IN 1935

December 3, 1984

Mr. Thomas J. Owen
District Manager
Carson City District
Bureau of Land Management
1050 E. William, Suite 335
Carson City, NV 89701

Dear Mr. Owen:

Thank you for the opportunity to comment on the Draft Resource Management Plan and Environmental Impact Statement for the Walker Resource Area.

The Wilderness Society strongly objects to the preferred alternative "B," which would recommend neither Burbank Canyon nor Cabbs Valley Range as suitable for wilderness designation. By placing them in the inventory, BLM has already determined these two areas to possess suitable wilderness characteristics. In the Walker Wilderness Technical Report BLM describes 90% of Cabbs Valley and 80% of Burbank Canyons as natural. Cabbs Valley has excellent opportunities for solitude, especially in the center canyons, while Burbank Canyons boasts excellent to outstanding solitude and daylikking opportunities.

The state of Nevada would benefit greatly by the addition of these two wilderness areas. Wilderness is a scarce commodity in Nevada; currently only one area, Jarbidge, exists. Both Cabbs Valley Range and Burbank Canyons would add to the presently underrepresented Great Basin Physiographic Region. The west-central section of the state also lacks riparian areas, which serve as valuable watering, feeding and resting sites for both wildlife and livestock. Less than one percent of the Walker Planning Area is riparian habitat. A wilderness designation would protect three
9-1 hundred acres of riparian habitat in Burbank Canyons. Non-designation "could result in mining activities degrading riparian habitat within these areas." We do not feel a "Scenic Area" designation would be strong enough to protect this precious resource.

9-2 Both WSAs would also suffer deterioration of scenic values because of mining and increased ORV activity, as well as soil erosion and vegetation removal.
9-3 Non-designation could also have a negative impact on the bald eagle wintering area in Red Canyon Creek.

278 POST STREET, #400, SAN FRANCISCO, CA 94108

Response 9

9-1 This point is reflected in the FEIS analysis of impacts, Chapter 4.

9-2 Impacts of mineral exploration and development are addressed in the FEIS. The FEIS also documents that ORV use levels are very low and not expected to increase dramatically. Particularly in the Burbank Canyons WSA -- which is closer to urban areas -- ORV use is severely limite by the rugged terrain and administratively restricted.

9-3 This northern part of the WSA in Red Canyon is part of a much larger area which a bald eagle has been observed using for hunting in winter. This is brought out in the FEIS. The likelihood of significant impact to the eagle from actions under any management alternative is too low to be considered an issue to address in detail.

Comment Letter 9

Mr. Thomas J. Owen

December 3, 1984
Page Two

9-4 We also object strongly to the way BLM has presented Alternative E, the All Wilderness Alternative. Wilderness designation does not preclude grazing. The Wilderness Act states that "...the grazing of livestock, where established prior to the effective date of this Act, shall be permitted to continue subject to such reasonable regulations as are deemed necessary by the Secretary of Agriculture" [sec. 4(d)(4)(2)]. Tacking a "no grazing" provision on the All Wilderness Alternative distorts the intent of the Wilderness Act and the mandate of FLPMA. It is our opinion that the All Wilderness Alternative should be presented alone, without the "no grazing" attachment, thus making it a more widely acceptable alternative. We also urge the BLM to adopt this alternative as the preferred one.

9-5 The Wilderness Society also urges Wilderness rather than ACEC designation for Stewart Valley and East Walker River. Stewart Valley's significant and abundant fossil resources should be congressionally preserved and protected for the study and appreciation of future as well as the present generations. The Barstovian insect fauna is the "best record of Middle Miocene insects in the world." Furthermore, "the abundance, diversity [and] excellent preservation of the fossils, [as well as] the diverse types of sedimentary rocks, makes this area a uniquely ideal setting for research and educational uses."

The section of E. Walker River has been identified as "one of the more outstanding remaining natural river systems in the Great Basin" by the Heritage Conservation and Recreation Service. This area has outstanding scenic, archaeological and recreational values, and would, again, best be protected under a wilderness designation.

Burbank Canyons and Cabbs Valley Range represent a mere five percent of the entire Walker Planning Area. This leaves 95% of the area that can be developed. Wilderness is as valuable a use as mining or geothermal leasing or ORV activity. Considering the small size of the WSAs in relation to the rest of the area, and the outstanding wilderness characteristics they possess, it is certainly a responsible and reasonable request to recommend them both as wilderness. At the very least we urge BLM to adopt instead Alternative D, which would redefine the boundaries to omit areas of highest mineral activity.

Thank you for your consideration of our response.

Sincerely,

Patricia Hedge
Regional Director, California-Nevada

Jeri Galbraith
Administrative Assistant, California-Nevada

Response 9

9-4 Agreed. The All Wilderness Alternative is presented in the FEIS without the "no-grazing" feature. The two elements were combined in the RMP/DEIS for the purposes of comparison and analysis, but not to give the impression that grazing would have to be terminated in wilderness. In the FEIS wilderness alternatives, grazing would be expected to continue as in the past.

9-5 It is agreed that both Stewart Valley and the East Walker River area contain unique and outstanding natural and cultural values. However, these areas were inventoried for wilderness characteristics, along with all other public lands, and found not to meet established criteria for wilderness study. The presence of even the most valuable fossil resources or the most outstanding natural river system would not alone qualify any area for wilderness study if the necessary qualities of naturalness and outstanding opportunities for solitude or primitive and unconfined recreation were not present. In these two cases, the Bureau is using other means of resource protection, including ACEC designation, withdrawal and segregation from mineral entry, scenic area designation, off-road vehicle limitations, and regulation of fossil-collecting.

Comment Letter 10

Fischer-Watt Mining Co. Inc.

ADMINISTRATIVE OFFICE
340 FREEPORT BLVD. SUITE 3
SPARKS, NEVADA 89431
PHONE (702) 355-0947

FIELD OFFICE
114 FIETHER, SUITE 7
KINGMAN, ARIZONA 86401
PHONE (602) 753-1622

10 Dec. 84

District Manager
Carson City District
1050 E. William, Suite 335
Carson City, Nevada 89701

Gentlemen:

After careful review of the Draft Walker Resource Management Plan and EIS for the Walker Resource Area, I feel that, of the suggested alternatives, only Alternative No. A (the No Action alternative) can be the logical choice. This choice is supported by myself and the company for the following reasons:

10-1

1. No lands will be withdrawn for Wilderness classification. In the Walker Resource area, this is a paramount requirement as this area is one of the most well-mineralized portions within the state of Nevada. To withdraw any acreage, no matter how little, in such a well-mineralized area, is to prevent local citizens from obtaining the benefit of jobs, security, and economic growth from potential future mining operations. To say that any acreage within the Walker Resource area has low to minimal mineral potential is absolutely ridiculous, as new mineral discoveries are made several times a year within the area.
2. Alternative A is the most cost-effective. During these recessionary times, both government and the private sector must select the least expensive plans. If Alternative A is selected, $136,000.00 will be saved over the next more conservative alternative.
3. Burbank Canyon (NV-030-525A) is within an area of extremely attractive mineral potential. Evidence for this is obvious: two patented claims are within the area, the South Camp Mine and the Taylor Hill mines are within the southern portions of the area, the Red Canyon gold claims border and overlap the northern boundary of the area, and the Washoe gold claims border and overlap into the western border of the area. Needlesstosay, the area is extremely well mineralized and should have no restrictions for mineral entry. Although it may be argued that designation of Burbank Canyon as a Scenic Area will not restrict mineral entry, in practise and in fact, such a designation effectively prohibits mineral exploration and development.

10-2

For the above reasons, we feel Alternative A should be selected.

Sincerely,

L. J. Buchanan

L. J. Buchanan, manager

Response 10

10-1 The mineral favorability classification scheme takes into consideration the geologic environment and inferred geologic processes. It is outlined in detail in the Geology, Energy and Mineral (GEM) Reports for each WSA. These reports are available for review at the Carson City District Office. These reports are based on analysis of existing data. They indicate that portions of the WSAs are either unfavorable or have low favorability for the accumulation of mineral resources. Any areas recommended for designation as wilderness will have intensive mineral inventories conducted by the U.S. Bureau of Mines and the U.S. Geologic Survey.

10-2 Please refer to Hawthorne Hearing Response No. 5.

Comment Letter 11

Coeur Explorations, Inc.

A Subsidiary of Coeur d'Alene Mines Corporation

SUITE 26, 255 GLENDALE AVENUE, SPARKS, NEVADA 89431
PHONE (702) 359-2252

December 14, 1984

Thomas J. Owen
District Manager, BLM
1050 East William Street Suite 335
Carson City, Nevada 89701

Re:Walker Resource Management Plan

Dear Mr. Owen:

I am writing in response to the proposed long range Walker Resource Management Plan. I am in favor of the preferred Alternative "B", under the following reservations:

11-1 A complete mineral investigation be done prior to the sale or exchange of any public lands within the Walker Resource area. If substantial mineral potential is found, then the lands would be withdrawn from sale or exchange status. Although I agree that neither of the WSA's (Burbank Canyon and Gabbs Valley Range) should be recommended as suitable for wilderness designation; I

11-2 am concerned that limited ORV designation would affect future exploration activities. The proposed Stewart Valley ACEC would have a major adverse impact on the minerals industry. Also costs prior to exploration would increase since plans of operation would be required for any surface distributing activity in the proposed ACEC.

I would not like to see any action which would preclude location of new mining claims without a complete mineral examination.

Sincerely,

Steven Berke

Steven Berke
Landman
Coeur Explorations, Inc.

Response 11

11-1 It is standard operating procedure to conduct a mineral potential examination prior to transfer of lands. Mineral rights are reserved to the United States unless on examination, there are no known mineral values or the non-mineral development has more values than the minerals, and reservation of mineral rights would interfere with such non-mineral development.

11-2 This concern is logical, and impacts to motorized vehicle use and mineral exploration are treated issues for the Gabbs Valley Range WSA. In the Burbank Canyons WSA, rugged terrain already severely restricts vehicle access, so the existing administrative closure to vehicles is little additional hindrance to prospecting.

Comment Letter 12

WHOA!

WILD HORSE ORGANIZED ASSISTANCE
INC.
A Foundation for the Welfare of
Wild Free-Roaming Horses and Burros

P. O. Box 555
Reno, Nevada 89504
Telephone 785-4688
Area Code "702"
785-4887

BOARD OF TRUSTEES
DAVID R. BELDING
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GORDON W. HARRIS
BELTON P. MOURAS
GERTRUDE BRONN, Honorary
In Memoriam
LOUISE C. HARRISON
VELMA B. JOHNSTON, "Wild Horse Annie"

January 3, 1985

Mr. Tom Owen, District Manager
Bureau of Land Management-Carson City District
1050 East William Street, Suite 335
Carson City, Nevada 89701

Dear Mr. Owen:

Thank you for the opportunity to comment on the Draft Walker Resource Management Plan and Environmental Impact Statement. Having had some feedback from previous land use plans in your District; I must add that the general public does not really understand this process and how it applies to them until after the environment in their surroundings are impacted. I believe this is attributable to the lack of publicity in these rural communities, where many residents of intermingled private lands and those abutting public lands reside. Certainly the residents in Spanish Springs did not believe the Pah Rah wild horses pertained to their wild horses.

WHOA has become increasingly pessimistic that any effort on the part of the general public, WHOA included, will not change the statis quo. However, for administrative purposes, WHOA submits our comments on the Walker.

LIVESTOCK

Alternative A and B are identical in that each would maintain the statis quo, but more than double the cost to the taxpayer. Please explain how BLM develops fences and cattle guards that would benefit wild horses and wildlife? How does BLM determine the relative value of those resources other than livestock? Alternative C would double the number of livestock on the range and sacrifice 80% of the wild horses in their increasingly limited herd areas. Therefore, WHOA supports Alternative D for livestock grazing.

Monitoring: Who will establish and collect data for the utilization and trend sites?

6-19

Comment Letter 12

Page two-Walker

Range Improvements: No new range improvements should be implemented until monitoring establishes the need. Any range improvement, such as water, must be for multiple use. If tax dollars are to be used. Any improvements on public lands with private funds must have stipulations on the permits for multiple uses, including wild wild horses.

WILDERNESS

12-1 WHOA supports Alternative D for Wilderness as further protection of the wild horse habitat. Recommendations to Congress on proposed wilderness must include wild horse herd management plans as part of the existing resource. This alternative could give BLM some incentive for managing horse populations, other than just reduction.

LAND TENURE

BLM has the necessary procedures for the disposal of lands for community expansion without seeking relief. WHOA supports Alternative E.

RIGHT OF WAY CORRIDORS

Applications should be considered on a case-by-case basis and as the need arises. WHOA supports Alternative E.

ACEC

WHOA supports Alternative C for protection of environmentally sensitive lands.

WILD HORSES

Please explain why wild horses have not been "allocated" any forage? Wild horses inhabit approximately 30% of the State of Nevada, increasingly that 30% has dwindled drastically because of livestock interests and private lands. This is true because of BLM's perception that minority rules over the public interests. While the "fence against regulation" may have been struck down nationally because it was not consistant with the law; Nevada's law states that in designated open range, the private land owner must fence against. Therefore where the federal law does not apply, the State law does.

Therefore WHOA supports Alternative D for wild horses, with the understanding that sufficient monitoring systems will be developed to attribute overuse to the particular offending animal. All adjustments, upward or downward, dependant upon the data collected through monitoring. If overuse is occuring from wild horses, then the wild horse will be reduced. If overuse is occuring from livestock, then reductions will come from livestock AUMs. If not attributable then both should be reduced pro-rata.

Comment Letter 12

Page three-walker

Water developments for wild horses must be developed for multiple use benefit, when tax dollars are used. All developments on public lands with private funds, must have stipulations on the permits for multiple use, including wild horses. Range improvements in herd management areas must inform the interested parties through consultation and coordination.

WILDLIFE

WHOA supports Alternative E for wildlife; and the management of wild horses and livestock in critical wildlife habitat, where data subtantiates the need.

WATERSHED AND RIPARIAN

WHOA supports Alternative E for both and the management of wild horses and livestock in riparian zones, where data substantiates the need.

Most sincerely,

Dawn Y. Lappin

Dawn Y. Lappin (Mrs.)
Director

Response 12

12-1 Wilderness recommendations to Congress will concern only whether or not to designate areas as wilderness. Management plans will be developed for any areas designated as wilderness. As specified in Chapter Two of this document, these plans will be coordinated with other activity plans, including herd management area plans for wild horses and burros.

Comment Letter 13

CALIFORNIA ASSOCIATION OF 4WD CLUBS INC.

5631 Rosebud Lane, Unit M-1
Sacramento, CA 95841
(916) 338-4549

January 11, 1985

BLM, Carson City District Office
Mr. Thomas J. Owen, District Manager
1050 East William St, Suite 335
Carson City, NV 89707

Dear Mr. Owen,

The Draft Resource Management Plan with E.I.S. has been reviewed and we recommend alternative "B" be adopted as the most appropriate management action. In addition, alternative "D" appears to meet the needs of most of the public concerned with the use of this area. It also provides for some expansion of recreational opportunities in the long term without locking up any more public lands in wilderness status.

We consider your draft plan to be well prepared and easy to understand. Please keep us informed of future action.

Sincerely,

Ed Dunkley
Field Representative

Comment Letter 14

WOMEN IN MINING

January 17, 1985

Thomas J. Owen
District Manager
Carson City BLM District
1050 East William, Suite 335
Carson City, NV 89701

Dear Mr. Owen,

The following comments concern the Draft Walker Resource Management Plan. After reading the draft alternatives, I support alternative "B" with respect to minerals, wilderness, and the Stewart Valley Paleontological Site.

First, as a member of Women In Mining and a firm supporter of the minerals industry, I feel that nearly all public land should be open to mineral entry. Our country as a whole needs the minerals and metals produced to maintain our high standard of living and security. The state and local economy benefits from the jobs created by the minerals industry. Economic mineral deposits are not convenience items which are available everywhere. A prospector must be given the opportunity to search vast amounts of land to locate the few economic deposits.

Second, I am opposed to both of the Wilderness Study Areas in the management plan. Nevada has enough pending and current wilderness acreage already. Vast acreages of Nevada will retain suitable wilderness characteristics, due to the mountainous terrain, without a federal wilderness designation. Too much public land, wilderness and otherwise, has already been withdrawn from mineral entry and other multiple uses.

Third, I support the Area of Critical Environmental Concern designation for the Stewart Valley Paleontological Site, with 1280 acres withdrawn from mineral entry. I feel that some protection is necessary for this site, although a complete 16,000 acre withdrawal is too much.

Finally, I have a question. What is the meaning (definition) of the term "segregated from mineral entry" as it appears on page 4-23 concerning the East Walker River? I would appreciate a response, as several people would like to know.

Thank you,

Nancy J. Wotruba

Nancy J. Wotruba, Member
Women In Mining

Battle Mountain Chapter
P.O. Box 1064 Battle Mountain, Nevada 89820

Comment Letter 15

SIERRA CLUB

Toiyabe Chapter -- Nevada and Eastern California

January 24, 1985

Tom Owen, Manager
BLM/Carson City District
1050 E. William #335
Carson City, NV 89701

Dear Manager Owen,

On behalf of the Public Lands Committee of the Toiyabe Chapter of the Sierra Club, I am submitting the following comments on the draft Walker RMP/EIS:

Scoping - The Sierra Club submitted extensive comments in Step 1 of the planning process. We appreciate the revisions which we requested which were made in the alternatives. Several of our suggestions were not acted on and no explanation was given for BLM's dismissal of them. We appreciated receiving a copy of the planning criteria, but have not yet received a copy of the AMS which we requested at the same time. Has an AMS been developed? Is it available to the public? Does it have to be requested under FOIA? Please advise us of the answers to these questions.

Despite the changes made in the alternatives based on scoping, in our review of this draft RMP/EIS, we find both procedural and substantive inadequacies. Since the document incorporates part of the Reno MFP/EIS, due to the overlapping of planning units and resource areas, we would also like to incorporate by reference our comments on the draft Reno MFP/EIS into these comments, especially since the Sierra Club is currently seeking judicial relief for the inadequacies of the Reno plan. We are particularyly dismayed by BLM's casual assignment of other resource values to the "implementation" section of Chapter 2. We restate the question we raised in our scoping comments "Isn't the RMP supposed to be the broad management plan guiding BLM activities for the next 10-20 years? If so, it must include more than the proposed abbreviated list of resource values, or it is not going to be adequate as a guide to public land decision making." This procedure violates multiple use management requirements. 15-1

Preferred Alternative

Rangeland Management - The issue which we raised was livestock overgrazing. The preferred alternative proposes to "do nothing and monitor" rather than to take any active steps to end overgrazing, not withstanding the requirements of law. The DRMP/EIS adequately documents the scope of livestock overgrazing, but declines to do anything about the problem, except study it.

LAS VEGAS GROUP
P.O. Box 19275
Las Vegas, Nevada 89119

To explore, enjoy, and protect the wild places of the earth . .

GREAT BASIN GROUP
P.O. Box 1496
University Station
Reno, Nevada 89507

Response 15

15-1 The Walker RMP/EIS has been prepared in conformance to the BLM planning manual 1616 and the Council on Environmental Quality (CEQ) regulations for preparing EISs. Manual 1616 provides for focusing the RMP on significant resource issues rather than attempting to cover all resources. This procedure maximizes the efficiency of the planning process. CEQ regulations state that Federal agencies shall discuss "...only briefly issues other than significant ones" (40 CFR 1500.4(c)). Therefore the Walker RMP/EIS analyzes significant issues such as wilderness in detail and discusses less significant issues such as forestry only briefly.

Comment Letter 15

The DRMP/EIS fails to disclose how much data is or is not currently available on which to base decisions on adjusting livestock numbers to the carrying capacity of the area. We request that the FRMP/EIS disclose the amount of existing data, both from inventory and from monitoring which is currently available, as well as how much more data BLM deems necessary before adjusting livestock numbers. We also challenge the categorization of grazing allotments which we will discuss in our comments on Chapter 3. This proposed management action violates the requirements for sustained yield management.

15-2 Wilderness - We object to the non-recommendation of any wilderness in the preferred alternative, which is supposed to be "balanced." In particular, we object to the omission of the a positive recommendation for the Gabbs Valley Range WSA, because roads constructed in violation of the Interim Wilderness Management Regulations are apparently now being used illegally by BLM to disqualify the WSA. Detailed comments on this issue will be submitted in other Sierra Club comments.

Land Tenure and ROW Corridors - The acreage identified for disposal in the preferred alternative is still excessive. In addition, the DRMP/EIS is still not clear that any such lands should first be offered to other federal, and state and local governments, before being made available for sale. The 217 miles proposed for ROW corridors is still excessive. In our scoping comments we specifically asked whether the ROW were designated and, if not, why the DRP/EIS should not analyze whether the ROWs should be granted and whether facilities built without ROW permits should not be removed if they occur in sensitive areas. We again request that this concern be addressed in the FRMP/EIS.

ACECs - We support the objectives and management actions for ACECs in the preferred alternative.

Chapter 3 Affected Environment

Watershed - The Sierra Club strongly supports BLM's proposals to protect watershed and riparian areas.

Wildlife - We find BLM's wildlife proposals to be very deficient, both in terms of population and in terms of wildlife habitat rehabilitation, protection, and enhancement. Reducing livestock numbers to the carrying capacity of the range would probably be the most effective way of improving wildlife habitat. Protecting riparian areas would be next in importance, and facilities such as a few guzzlers, etc., would be a poor third.

Vegetation - The Sierra Club has stated often our opposition to BLM's categorizing livestock allotments into its M I C key-mouse system in lieu of taking any decisive action to end livestock overgrazing. Notwithstanding our general opposition, we specifically object to the MIC categorization of allotments in this planning area. The overgrazing problems identified in Table 3-3 are not reflected in the table on categorization in Appendix

2

Response 15

15-2 The roads constructed in violation of the IWP Regulations were not used by this agency during any evaluation of the wilderness qualities of the Gabbs Valley Range. The roads were examined by a special study team in February - March 1981. Appropriate measures were taken at that time to mitigate the situation.

A number of factors related to mineral interest, extension of existing operations, mineral potential, quality of the scenic value, and wilderness characteristics resulted in the recommendation of nonsuitability for this WSA.

Comment Letter 15

D. Table 1. Table 3-3 shows livestock overgrazing (heavy and severe utilization from 27% to 71%) in 19 of 41 allotments. Yet, only 6 of these overgrazed allotments are in the I or improve category. 5 are in the M or maintenance category, although M allotments must meet the following criteria: present range condition is satisfactory and/or improving, present management is satisfactory, the allotment has moderate to high resource production potential, and there are no, or very limited, resource or land use conflicts, etc. 8 overgrazed allotments are in the C or custodial category and must meet the following criteria: present range condition has stabilized or is not a major factor, present management appears satisfactory, the allotment has low resource production potential, and resource or land use conflicts are limited, etc. We do not feel overgrazed allotments are in satisfactory condition nor is the present management satisfactory, and there definitely is a conflict with the requirements of good range management. The categories in the FRMP/EIS should be revised to reflect the overgrazing problems identified in Table 3-3.

In addition, notwithstanding the legal requirements of FLPMA, the use of "livestock forage condition" instead of studies showing ecological conditions in the Walker DRMP/EIS is a giant step backward for BLM to the days of dominant livestock use of the public lands, and a telling demonstation of the lack of multiple use as a meaningful management and planning objective for the Walker RA.

Wild Horses and Burros - We support the completion and implementation of WHMPs, as well as the designation of Marietta Wild Burro Range. Horse use must also be reduced to the carrying capacity of the range, but we strongly object to BLM removing wild horses and then permitting livestock to replace the captured horses.

Recreation - The document is deficient in planning for recreation, the most prevalent and valuable resource in this area. While we support BLM efforts to protect and better manage fisheries, the lack of efforts to improve wildlife habitat with resulting negative impacts on both hunting and non-consumptive wildlife values and the negative wilderness recommendations with resulting negative impacts to backcountry recreation demonstrate BLM's lack of commitment to improving management of this valuable resource.

Land Tenure - See comments on the preferred alternative.

Economic Conditions - This section convincingly illustrates the general unimportance of livestock grazing to the county economies. The analysis of Alternative E reveals that totally eliminating livestock use of the public lands would result in less than a 1% change in employment and in average income. The analysis of the economic value of recreation is seriously deficient.

Comment Letter 15

Social Conditions - This analysis overemphasized the anti-wilderness feeling of local residents and livestock permittees and made no reference to the pro-wilderness attitudes of urban residents who live near this planning area, as well as to the generally positive feelings toward wilderness of the rest of the country.

Chapter 4 Environmental Consequences - This chapter is also seriously deficient. This analysis would have the reviewer believe that removing 100% of livestock (in Alternative E) would produce the same percent of change in forage condition - 3% - as the level of use proposed in the preferred alternative (which is 34% over good range management levels of 55% utilization). At least the measure of erosion does show a significant reduction from the elimination of grazing. This whole chapter is a pro-forma exercise with little serious attention to the analysis of environmental impacts of the management proposals in the various alternatives. It does, however, indirectly support our contention that the range of alternatives is deficient, since the impacts of the management actions in those alternatives are not significantly different.

In short, we find this document to be procedurally and substantively inadequate. We know that we can't realistically expect BLM to revise the FRMP/EIS to comply with the requirements of FLPMA and PRIA, unless national policy changes or we file a court suit to force the agency to comply with its laws. But, being more optimistic than realistic, we will once again request that BLM revise this planning document to develop a reasonable range of alternatives which will result in the elimination of overgrazing in the Walker RA, ASAP, not sometime in the hazy future when BLM has "enough" data, and the proper management of all the multiple uses of the public lands in the Walker RA, that BLM adequately analyze these alternatives to learn and tell the public of their impacts on the environment, and lastly, to design a preferred alternative which will continue to permit all the multiple uses of the public lands with minimal negative impacts to the environment. This type of pro-forma document does a disservice to the professional BLM employees who are well-trained and committed to good resource management as well as to the public which has entrusted the agency with the responsibility for proper multiple use and sustained yield management of our public lands.

Sincerely,

Rose Strickland

Rose Strickland, Chair
Public Lands Committee

Comment Letter 16

SIERRA CLUB

Toiyabe Chapter -- Nevada and Eastern California

720 Brookfield Drive
Reno, Nevada 89503
January 24, 1985

Tom Owen, District Manager
Carson City District, BLM
1050 East William St.
Carson City, NV 89701

Dear Mr. Owen:

Thank you for the opportunity to comment on the Draft Walker RMP and EIS.

I feel that the preferred alternative must be improved in several ways in order to become a viable document for the best management of the land and all its resources. First the "no wilderness" recommendation is totally unsatisfactory. Even Alternative C with an "emphasis towards production of commercial resource uses" recommends 9970 acres of wilderness in Burbank Canyon and 27,860 acres in the Gabbs Valley Range. There seems to be little resource or private land conflicts according to this recommendation. Presumably a "balanced" preferred alternative would adopt this as a lower limit for a wilderness recommendation.

I have read the Walker Wilderness Technical Report which was sent to me after the public hearing by a member of your staff and find that many of the statements in this report tend to downgrade the wilderness quality of the two WSA's and indeed of all Great Basin type wilderness candidates. For example, on Page 42 the statement is made that "when compared to other Great Basin landscapes the area (Burbank Canyon) contains good scenic quality." It is exactly this kind of thinking that has kept the Great Province so under-represented in the National Wilderness System. It is implied that no one would care to hike in Burbank Canyon with the Sierra Nevada so close except when the latter is under deep snow. This is like comparing Mexico and Alaska. The small size of the WSA is also cited as a reason for no wilderness. Since the suitable area is twice as large as the minimum 5000 acres and since there are canyons and good vegetative screening, this scarcely seems a valid criticism. I myself have hiked in the Burbank Canyon WSA and consider it a prime candidate for wilderness in the Carson City District. 16-1

LAS VEGAS GROUP
P.O. Box 19177
Las Vegas, Nevada 89119

explore, enjoy, and protect the wild places of the earth

GREAT BASIN GROUP
P.O. Box 8296
University Station
Reno, Nevada 89507

Response 16

16-1 Criteria for evaluating the WSAs did not include comparisons with other areas. Rather, conflicting interests and resources were the influencing factors which resulted in the recomendations of nonsuitability.

Comment Letter 16

SIERRA CLUB

Toiyabe Chapter – Nevada and Eastern California

Tom Owen, District Manager
1/24/85. Page 2.

I support entirely the Alternative D recommendations for ACEC's in both Stewart Valley and along the East Walker River. The paleontological resources in Stewart Valley are invaluable and need to be protected from ORV misuse and "wildcat" collectors. The East Walker is an important wildlife and fishing resource and has already been degraded by inappropriate ORV use. It also needs the protection of ACEC designation.

As I stated in my testimony at the December 4th Public Hearing, I fail to understand why there has not been an ecological condition survey completed in the Walker Planning Area since there are obviously many problems. Such a survey needs to be done immediately before intelligent management decisions can be made. However, the statistics that are given, particularly with respect to riparian areas, are alarming. On Page 3-13 it is stated "protected and ungrazed areas are in good condition and most heavily grazed riparian areas are in a poor condition class." Riparian areas are a precious resource in this arid country, particularly for wildlife, and your statistics show that these areas have been grossly mismanaged. Your preferred recommendation should state that all riparian areas should be restored to good condition as soon as possible by protecting them from grazing use.

I am also concerned with the plight of the antelope as described on Page 3-20 and of the sage grouse whose habitat is obviously disappearing as wet meadows are being degraded. These situations should be addressed immediately in your management plan.

I hope that the Final EIS will correct these obvious deficiencies in wilderness, wildlife, and riparian area management and that you will be able to put together a really "balanced" preferred alternative that puts proper emphasis on these important resources. Please send me a copy of your final EIS.

Sincerely,

Marjorie Sill

Marjorie Sill, Chairperson

LAS VEGAS GROUP
P.O. Box 19777
Las Vegas, Nevada 89119

To explore, enjoy, and protect the wild places of the earth...

GREAT BASIN GROUP
P.O. Box 5296
University Station
Reno, Nevada 89507

Comment Letter 17

2921 NE 33rd Street
Lighthouse Point, Florida 33064
November 11, 1984

District Manager
Carson City District
Bureau of Land Management
1050 E. William, Suite 335
Carson City, Nevada 89701

Dear District Manager:

Regarding the Walker Wilderness Technical Report, I recommend the establishment of two Wilderness Areas totaling 92,995 acres. I support the All Wilderness Alternative. Wildlife im the Gabbs Valley Range unit include mountain lion, bobcat, deer, and golden eagle. There are 500 acres of riparian habitat in the Burbank Canyon unit. There are also White fir, mountain mahogany, and Jeffrey pine. I lived in Nevada for twenty years and have been to the Pine Nut Mountains. It is important that these two areas be added to the Wilderness System to preserve their primitive condition.

Sincerely,

Reed Secord

Reed Secord

Comment Letter 18

Thomas J. Owen
District Manager
Carson City BLM District
1050 East William, Suite 335
Carson City, NV 89701

Jan 23, 1985

Dear Mr. Owen,

The following comments concern the Draft Walker Resource Management Plan. After reading the draft alternatives, I support alternative "B" with respect to minerals, wilderness and the Stewart Valley Paleontological Site.

First, as a member of Women In Mining and a firm supporter of the minerals industry, I feel that nearly all public land should be open to mineral entry. Our country as a whole needs the minerals and metals produced to maintain our high standard of living and security. The state and local economy benefits from the jobs created by the minerals industry. Economic mineral deposits are not convenience items which are available everywhere. A prospector must be given the opportunity to search vast amounts of land to locate the few economic deposits.

Comment Letter 18

Second, I am opposed to both of the Wilderness Study Areas in the management plan. Nevada has enough pending and current wilderness acreage already. Vast acreages of Nevada will retain suitable wilderness characteristics, due to the mountainous terrain, without a federal wilderness designation. Too much public land, wilderness and otherwise, has already been withdrawn from mineral entry and other multiple uses.

Third, I support the Area of Critical Environmental Concern designation for the Stewart Valley Paleontological Site, with 1250 acres withdrawn from mineral entry. I feel that some protection is necessary for this site, although a complete 16,000 acre withdrawal is too much.

Finally, I have a question. What is the meaning (definition) of the term "segregated from mineral entry" as it appears on page 4-23 concerning the East Walker River?

Thank you.

B. DeBonia
Women In Mining
member.

COMMENT LETTER 19

JOHN R. SWANSON
P. O. Box 922
Berkeley, CA 94701

December 10, 1995.

Bureau of Land Management.
Carson City District ~ District Manager
1050 East William - Ste. 335
Carson City, Nevada 89701.

Dear Sir;

Please accept my comments, as follows, concerning ====

Walker Basin Resource Management plan - Draft in Wanted Document Wilderness

I have been acquainted with this portion of Nevada for many decades, and do remain of the opinion that each Walker Plan area contains outstanding Wilderness, wildlife, fish, habitat and cultural resources of extreme national significance.

Area (s) that provide a Vital and as all americans hope, a lasting heritage for them and for future generations to enjoy.

The agency use of the Federal Public lands agencies is to preserve Wilderness, scenic, wildlife, fish, habitat — all Biological Resources — and cultural resources located on such Federal Public lands.

With high and strong Want the Federal Public lands to be established as permanent Reserves.

Preserve to protect ecosystems - preserve watersheds, some and enhance wildlife and fish and their respective habitats, preserve, protect and enhance all Biological Resources and their diversity, restore - rescue all such damaged areas to their natural environmental condition, and to preserve, protect, strengthen and expand Wilderness.

as Wilderness is the foundation of all land and Water Resources.

With the goal use of all land and Water Resources planning and management to preserve, protect, strengthen and expand Wilderness.

I request the following areas - acres located in this Walker Resource Management plan area; Bureau of land Management property has, be fully classified and permanently protected as Wilderness; as Center land and features unique Wilderness attributes, and to be included in our National Wilderness Preservation System — at this time:

- Beauty 39,450.
- Heritage Mine 28,900.
- Bobby Valley Range 118,465.
- Bar Beach Canyon 74,320.
- Plus, additional areas located on this Walker Resource Management plan area; Bureau of land Management properties, total acre 615,000 acres.
- So as to establish a total of - at least - 855,000 acres of Wilderness to be located, from on each Walker Resource Management plan area; all Bureau of land Management properties, and included in our National Wilderness Preservation System — now!

So select as the permanent planning - management alternative for this Walker Resource Management plan area;

alternative Preservation: Wilderness Wildlife, Biological Resources.

So permanently ban all forms of surface and sub surface development on all current, proposed or similar Wilderness areas, including; Wilderness Study Areas.

With No. Release of any roadless areas.

So acquire all inholdings on all Public lands. With No. Disposal of any Public lands.

The following areas must be preserved, as they contain Unique natural features:

- Stewart Valley Fault site, a Walker River, a Walker Lake (a Large Inverse Hydrology.

There are other areas on this Plan area to be added to our National Park System.

For whom we have our National lands and waters, including Wilderness;
our Sons Nevada, America and the World!

Sincerely,

J. R. Swanson.

Comment Letter 20

DAVID A. HORNBECK
ATTORNEY AT LAW
LICENSED IN NEVADA AND CALIFORNIA

1675 LAKESIDE DRIVE
RENO, NEVADA 89509-3408

AREA CODE 702
TELEPHONE 322-9077

January 25, 1985

HAND DELIVERED

Thomas J. Owen
District Manager
Carson City District
Bureau of Land Management
1050 East William Street
Suite 335
Carson City, Nevada 89701

Re: Draft Walker Resource Management Plan
and Environmental Impact Statement

Dear Mr. Owen:

My comments are directed to your proposed Resource Plan and EIS as they pertain to the two (2) WSAs in the Walker Resource Area, the Gabbs Valley Range WSA (NV-030-407) and the Burbank Canyons WSA (NV-030-525a).

Gabbs Valley Range WSA (NV-030-407)

As a result of the Intensive Inventory, 79,600 acres of the Gabbs Valley Range unit were designated a WSA. In the WSA Decision document, released November 15, 1980, the Gabbs Valley Range WSA was described in glowing terms. It stated, for example, that the "size and shape of the unit along with topographic and vegetative screening contribute to an outstanding opportunity for solitude.", "Excellent opportunities for hiking, horseback riding, hunting, sightseeing, camping, and nature appreciation in the unit constitute an outstanding opportunity for a primative and unconfined type of recreation.", "Wildlife, wild horses, scenery, and limited cultural resources are in the unit." The unit was described as having topography that "varies from alluvial fans with very little relief on the outer edges of the unit, to mountainous peaks and canyons. Vegetation also varies from desert scrub and extensive pinyon woodlands to willows and aspen trees along moist drainage.". The only slightly negative note was that "14 miles of ways and three spring developements were

Comment Letter 20

documented which are not substantially noticeable." (emphasis added).

These observations about the unit are borne out by my personal observations of the Gabbs Valley WSA, both on the ground and from the air. Even in the Draft Walker RMP at page 3-37, the opportunities for solitude are cited as "outstanding" and the numerous recreational opportunities are noted. In addition, "a significant archaeological site", apparently discovered during the study phase, is mentioned.

The only ostensible rationale for not recommending this outstanding area for wilderness designation appears in the last paragraph of the Draft EIS, which states:

> "Several problems exist for managing this unit as a wilderness. The unit is surrounded by ongoing mining activity, penetrated and transected on all sides by cherry-steamed roads and ways and range improvement projects. There is a continued interest in developing the mineral values of the area. The private inholdings further complicate this manageability problem (Table 3-9)."

The alleged "manageability problem" of the WSA is specious. This becomes obvious when one refers to the "Special Study: Gabbs Valley Range" which was produced by the BLM in 1981 as a result of illegal road building within the WSA authorized by the Mineral County Commissioners. Your letter of February 23, 1981, makes it clear that the road building was "not authorized".

20-1 The "ongoing mining activity" alluded to as a management problem is all outside the WSA. Furthermore, the Special Study points out that "There are no claims recorded in this area and based on the available information, grandfathered uses and valid existing rights are not an issue here." (Emphasis added). Thus, the "continued interest in developing the mineral values of the area" also cited is not relevant as any claims that may be made would be post-FLPMA.

Comment Letter 20

The "private inholdings" cited consist of one 40 acre site which has no road access, and is apparently undeveloped. Exchange of such property would seem the more logical management alternative to eliminating all wilderness.

Finally, we are left with the "problem" that the WSA is "penetrated and transected on all sides by cherry-stemmed roads and ways and range improvement projects.". An examination of Map 3 of the Special Study and a comparison of it with the roads and ways depicted on the wilderness alternatives maps in chapter two of the Draft EIS reads that the use of these roads and ways to create "management problems" borders on the fraudulent.

20-2 Referring to the Interim Management Policy (IMP), it should be noted that under the non-impairment criteria "Any temporary impacts authorized by the BLM under these criteria will be ignored during this wilderness study." (IMP, p. 11). Clearly any impacts not authorized by BLM should likewise be ignored. Furthermore, the IMP provides under its enforcement provisions: "If unauthorized activities result in surface disturbance or other degradation of the area's suitability for preservation as wilderness, legal action will be initiated as appropriate to obtain full restoration of the area. Impacts resulting from unauthorized activities will not disqualify an area from WSA status." (IMP, p. 16).

For these reasons, I urge you to include the Gabbs Valley Range WSA as recommended wilderness.

Burbank Canyons WSA (NV-030-525a)

20-3 Based on my personal experience within this WSA on numerous occasions of leading groups of people on day hikes, the problems expressed in the drafted EIS concerning management of that area as wilderness are unrealistic. The presence of ongoing mining activity on the peripheries of the WSA in no way degraded its value as wilderness. The existence of those activities and the mining hall road in Red Canyon were so distant as not to affect the wilderness experience even when viewed from the ridge.

Response 20

20-1 The special study cited was concerned solely with the impact of the unauthorized road construction, not with the suitability of the area for designation as wilderness. It did not identify eight unpatented mining claims in T. 10N., R. 33 E., Section 26. However, because the intent of the study was to analyze and evaluate the impact of the unauthorized roadwork on wilderness suitability, that oversight is irrelevant. Moreover, the study's observation that "...grandfathered uses and valid existing rights (were) not at issue here" was intended solely as a peripheral element in consideration of that roadwork. The statement should not be cited out-of-context to suggest that no grandfathered uses existed within the WSA boundaries on the date of designation of the Gabbs Valley Range WSA.

20-2 The special study states that illegal road building activity occurred in the Gabbs Valley WSA in 1981. This activity consisted of upgrading existing ways to roads and blading new roads. Since that time a number of additional previously existing roads and ways have been identified through public input and analysis of aerial photographs taken prior to the illegal road building activity. The maps in the Draft and the Wilderness Technical Report display roads and ways as they were before the illegal activity occurred. Some of the new roads are included and they were not considered in the No Wilderness recommendation in the Preferred Alternative/Proposed RMP. It should be noted that once the county was informed that their activity was illegal and would have no effect on the status of the WSA, they ceased operations and have cooperated fully with the BLM by blocking access to the new roads.

20-3 This point is relevant to the analysis of impacts and is addressed in the FEIS narrative.

Comment Letter 20

This outstanding area should definitely be designated a wilderness.

Very truly yours,

DAVID A. HORNBECK
Personally and on behalf of
The Wilderness Committee,
Toiyabe Chapter of the Sierra Club

DAH/dc

-4-

Comment Letter 21

COMBINED METALS REDUCTION COMPANY

Fish Lake Valley Via Tonopah, NV 89049 (702) 572-3252

15 W 56th Street
New York, NY 10021
(212) 765-7762

P.O. Box 2469
Evergreen, CO 80439
(303) 838-5880

December 13, 1984

Bureau of Land Management
Carson City District
Carson City, Nevada

re: Comment WSA 030-407

Wilderness Study Area 030-407 in the Gabbs Valley Range is not suitable for wilderness designation because of its greater importance as a mining district.

This is a highly mineralized area, which for some time has been enjoying increasing exploration activity by several prospectors and mining companies. It extends from the Bovard-Rand Mining District on the north end to the Santa Fe Mining District on the south. It lies only ten miles from Rawhide; eleven miles from the "Paradise Peak" operation; and is just across the highway from Westley's Santa Fe project, all three projects being in the advanced stages of development. Our own exploration department has recently identified ten separate mineral targets along a seventeen mile trend much of which lies within WSA 030-407.

This Wilderness Study Area should be dropped from further wilderness consideration because of its high mineral value and economic importance.

We appreciate your attention to this matter.

Very truly yours,

COMBINED METALS REDUCTION COMPANY

Jeremy D. Benezet

Comment Letter 22

January 24, 1985

Mr. Thomas J. Owen
District Manager, B.L.M.
1050 East William St., Suite 335
Carson City, Nevada 89701

Dear Mr. Owen:

Please include for the official record the following comments on the Draft Resource Management Plan and Environmental Impact Statement (INT DRMP/EIS 84-56):

I feel that I am uniquely qualified to comment on the issue of wilderness in Nevada as I am a member of every responding special interest group except ranching. I am a professional geologist with work experience with the U.S.G.S. (field mapping); Hanna Mining (base and precious metal exploration); Humble Oil and Refining Co., now Exxon (geophysics). I have also been president of my own mining company, Phoenix Mineral and Mining Associates, for ten years. That company successfully carried out precious opal mining operations at Virgin Valley, Humboldt Co., Nevada for two years as well as base and precious metal exploration and property evaluation in Nevada, Alaska, and elsewhere. During the opal mining operation we had the largest mining operation in Humboldt County according to the Nevada Bureau of Mines. I feel that I am familiar with much of Nevada because of these activities.

I consider myself a conservationist, but I also do considerable field collecting of rocks and minerals and am deeply involved with regional and national rock hound organizations. I have two bad knees which prohibit extensive field work, so I cherish my ability to drive my car like an ORV into the most outlandish areas. (I've gone farther than some motorcycles and pulled jeeps out of bogs.)

Finally, my parents had three lots on Assateague Island which were taken by the U.S. Government for the National Seashore there with what I still consider to be woefully inadequate compensation. There is absolutely no question, however, that the area has been put to a much better use as a National Seashore than had it been developed in cottages. I thoroughly enjoyed my subsequent visit there.

Possibly I have written far too much about myself, but I am going to propose some things for which I thought it best to state my qualifications. The most important is that I love Nevada very much and would consider it an honor to live there. Virtually everyone I spoke with in the area also cherishes the place, but most, in fact, are so familiar with it that they do not appreciate the uniqueness of the environment in which they live. In time, I think that they and their children will thank you for saving some portion in a degree of wilderness. The designation of Wilderness Areas seeks to preserve exactly those elements of the environment that we all cherish, whether we be ranchers, miners, rockhounds or "conservationists" (whoever they are).

I would concur that the three key management issues are important and should be dealt with. There are really four issues since land disposals and utility right of way corridors are actually separate issues. In fact, all four issues are essentially separate and distinct from one another within the allowable framework of existing laws and regulations. There is no useful purpose in lumping these together unless aggravation and fanning fear and prejudice are considered useful goals. As a particularly glaring example

Comment Letter 22

I would cite the lumping of a NO GRAZING ON ANY PUBLIC LAND and ALL WILDERNESS together in Alternative E. First, the no-grazing scenario is currently illegal and not an option under the current Taylor Grazing Act. Yet repeatedly the BLM has raised this specter to arouse fear in the ranching community. The no-grazing scenario covers the entire resource area. The ALL WILDERNESS scenario applies only to two relatively small WSAs. Grazing
22-1 rights in WSAs or wilderness areas are guaranteed by law and BLM regulation. The only purpose in linking these unrelated issues is a negative one -- namely to foment friction and distrust between several constituencies of the BLM. This is not a proper function of government, which should rather serve to facilitate interaction between citizens. Each issue of the four should have its own set of alternatives developed without the introduction of passions of unrelated issues. This is true because as currently presented the only thread of commonality of the issues is that the BLM has to decide something about them. It should decide them separately on their own merits.

Question: Why are the four issues not treated separately?

As the two areas have WSA status, it may be presumed that they meet the minimum wilderness characteristics. Loss of these outstanding wilderness values through non-designation represents a significant adverse impact. Decisions regarding suitability or non-suitability of an area for designation as Wilderness "will be justified" on the basis of [Wilderness] Planning Criteria (Walker Wilderness Technical Report -WTR p. 1). Each criterion and quality standard will be fully considered and documented in determining suitability (Lahontan DRMP/EIS p. 7-28). In my opinion the rationale for the preferred alternative, namely a recommendation of non-suitability for both areas has neither been documented nor justified.

All things considered, with the exception of one issue, the preferred alternative (B) appears in fact to be the balanced mid-range approach sought. The excepted issue is that of "wilderness." There is no balance in no wilderness!

BLM has alleged three significant conflicts in each of the two WSAs. These are 1) with "moderate" mineral potential in broad areas of each WSA; 2) with a high degree of mining interest in terms of current claiming and prospect development; 3) intrusive ways permitting ORV abuse.

The summary of the GEM report given in the WTR and DEIS is grossly inadequate. The
22-2 reader is given NO information as to the localized geology in either WSA. Do presumed lode claims the reader is given no information as to the metals sought or if any are actually present on the claim. In fact, from reading the summaries it could be inferred that no one even covered the ground to see what was there.

As to the assertion of moderate (let alone high) mineral potential for broad areas of each WSA, one needs to critically examine the definition (DEIS p. G-1). The geologic environment need only consist of being in the hills or mountains as opposed to the intermontane basins. The inferred geologic processes or hydrothermal emplacement, contact
22-3 replacement, or regional metamorphism of syngeneic deposits can be widespread without leading to any economically significant concentrations of metals. None of these processes (or any other) is specifically claimed to be present within a WSA. They just might be. A reported mineral occurrence is just that. Someone reports (often erroneously) that there is a particular mineral present. In and of itself this has absolutely no economic significance for production. Mineral occurrences do not make mines. Moderate potential for a mine requires a known mineral deposit, i.e., large enough reserves of sufficient grade to warrant extraction at a profit or near a profit. The way the definition reads, all the hills and mountains (as opposed to the intermontane valleys) would have moderate
22-4 potential. What we need is how the area of the WSA compares with the adjacent area, and similar areas regionally, nationally, and world-wide with respect to potential production. In the "summary" not a single comparison is given nor a specific ore mineral named. We

Comment Letter 22

are merely told that it appears that gold and silver are regionally the primary metallic targets. In short, there is no information given at all which is of any practical use. Without this sort of documentation there is no justification for using this alleged moderate mineral potential to offset wilderness values.

22-6 Question: Why was a better summary not given, or better yet why was the GEM report omitted from the WTR?

BLM Allegation: The Gabbs Valley Range contains a large area on the south side with moderate mineral potential and a high degree of mining interest and activity.

22-6 Response: The area is segregated in both the C and O alternatives. This conflict is thereby substantially reduced. Under alternative "C" the 37,000 acres have the highest wilderness values (DEIS p. 2-9). The 78,140 acres under alternative "O" by definition (DEIS p. 2-13) do not have major resource conflicts.

Question: Why does the preferred alternative recommend "no wilderness?"

BLM Allegation: The Burbank Canyons WSA has a large area on the north and west with high mineral potential and a high degree of mining interest.

22-7 Response: Again this area of 3425 acres is segregated under alternatives "C" and "O". The high quality wilderness values in Burbank Canyon, Little Burbank Canyon, and the north slopes of Rickey Canyon would be protected. The majority of resource conflicts and manageability problems would be eliminated. The remaining part of the unit can stand alone without the deleted acreage (DEIS p. 4-38).

Question: Why does the preferred alternative not recommend 9970 acres as suitable for wilderness designation?

BLM Allegation: The cherrystem roads and intrusive ways into the Burbank Canyons WSA create a management problem. Closure of the ways would work a hardship on traditional users.

22-8 Response: As reconfigured for alternatives "C" or "O" the area has one cherrystemmed inholding, and one faint trail (03) impacting (?) 200 acres in a small basin (WTR p. 39). The inholding is essentially peripheral (WTR Map 12). Even a cursory glance at Map 10 (WTR) shows that the vast majority of the area is simply inaccessible to ORVs. The loss of one short, faint trail is hardly significant.

Question: Why doesn't the preferred alternative recommend 9970 acres as suitable for wilderness designation?

BLM Allegation: Ways in Redrock Canyon (W-29), Paint Rock Canyon (W-06), and Corral Tom Spring Extension (W-17) make management problems for ORV use. The 40-acre private inholding could be a management problem if access were requested. Closure of ways would work a hardship on traditional users.

Response: As there appears to be some confusion as to the names of the roads and canyon figures on the map, I shall refer to them by number. Under alternative "C" W-06 and W-17 become part of the reconfigured boundary. W-29 is currently blocked to all but motorcycles and therefore poses a minimal problem. In any event, it follows the bottom of a wash. Under either alternative W-18 should be extended if necessary to gain access to the 40-acre inholding or it might be exchanged. The upper portion of W-06 also runs in a

Response 22

22-1 Indeed, grazing will likely continue in wilderness areas much as in the past, and this is indicated in the management actions for each alternative. The "no-grazing" scenario was used for purposes of comparison and analysis--not to cause friction.

22-2 In some cases, the preparers of the GEM reports relied on personal experience in the field of mineral resources, information supplied by claimants, published and unpublished geologic data, and other research materials rather than on field verification. Within the constraints of the projects' guidelines, it was not deemed necessary nor economically practical to examine each claim or to engage in localized studies of geology. Analysis of existing data led to delineation of areas of mineral potential (favorability) conditioned on varying degrees of confidence. These data and analyses are verifiable.

22-3 The preparers of the GEM reports analyzed available data and delineated areas having certain favorability for economic mineralization. They further assigned levels of confidence to each of these determinations. The confidence levels were based on such data as known mineral occurrences, known deposits, etc. While other, different, criteria might have been used to estimate the mineral potential (eg. "Moderate potential...requires a known mineral deposit."), the GEM report's authors felt the system they used to be a satisfactory method for portrayal of their conclusions.

22-4 Where it was deemed relevant, the GEM report's authors did, in fact, examine some of the geologic attributes of lands adjacent to the WSAs in reaching their conclusions about the favorability for mineralization within the WSAs. It was believed to be redundant to reiterate those analyses simply to justify the GEM conclusion. Moreover, comparisons of WSA mineral potentials with national and world-wide potentials was not within the scope of the WTR document.

22-5 The summary offered in the WTR was deemed adequate to support the conclusions reached regarding energy and minerals. CEQ guidelines require that supplementary documents be referenced in the report, not included. To append an additional 80 pages of text and maps would add little to the report's integrity but would drive printing costs up prohibitively.

Comment Letter 22

wash, so has a minimal effect, particularly as a boundary road. Roads going to range improvements have been cherrystemmed out. Most of the remaining ways in the redefined parcel of 27,860 acres either run in washes or are insignificant. Closure of ways would have little impact under alternative "C". Under alternative "D", W-29 remains naturally blocked. W-06 could become a problem, but over much of its length it follows the wash so that vehicular evidence should be ephemeral. The canyon may be physically hard to completely block, but a sufficient effort can be made and signs posted so that any potential trespasser would have no excuse of ignorance. Map 5 (WTR) indicates clearly that except for W-06 the major portion of the WSA is inaccessible to ORV uses anyway, particularly as configured for alternative "C" or "D". Even with W-06 the areas on either side are each sufficient to make a WSA!

22-6

Question: Why does the preferred alternative not consider either alternative "C" or "D" acreage as preferable?

There appears to have been a deliberate, major and gross violation of IMP for this WSA. It is my understanding that the Mineral County authorities used county equipment to illegally grade some 3.5 miles of W-29 and construct 2 miles of W-17!

Question: What if anything has been done to restore these areas to their former wilderness states?

Question: At whose expense?

22-10

Question: If nothing has been done -- why not?

Question: Were the perpetrators prosecuted? If not -- why not?

This is a fine WSA in its own right and some 68,170 acres ought to be recommended as suitable. Anything less would be a reward to these illegal despoilers who apparently sought to destroy this WSA before anyone else even had a say in the matter. These perpetrators must be shown that such activity will not be condoned. Why has the BLM apparently sanctioned this activity with its recommendation of non-suitability for the entire area?

Summary: As no significant adverse impacts have been documented for preferably 68,170 acres (Alternative "D") for the Gabbs Valley Range, this acreage should be recommended as suitable for designation as wilderness. An additional 9370 acres should be recommended as suitable in the Burbank Canyons WSA (Alternative "C" or "D"). In matters other than wilderness issues the preferred alternative "B" seems reasonable.

Sincerely,

Paul Clifford Jr.

Paul Clifford Jr.
2955 Berkshire
Cleveland Heights Ohio 44118

PC:hb

Response 22

22-6 Selection of Alternative C or D might substantially reduce some resource conflicts, but (1) mining would likely take place up to the southern border of higher area, and (2) the wilderness characteristics of much of the northern area would be rated as low.

22-7 The limited area under alternatives C and D would have been so small that manageability problems would have resulted. Moreover, because of topography in this WSA, adoption of C or D would have required construction of trails to prevent degradation of the wilderness values; construction of trails is contrary to management policy. Private land patterns and mining activity would preclude solitude. Outside sights and sounds would impinge upon the remaining wilderness characteristics of solitude and the opportunities for unconfined recreational activities (mandatory wilderness characteristics).

22-8 There are, in fact, four roads (not ways) and two inholdings involved. While the inholdings are peripheral, the nature of these patented lands (patented mining claims) suggests that there is real potential for degradation of the wilderness characteristics as mining activities expand. Further, the majority of the area is not inaccessible to such ORVs as motorcycles, ATVs, and four wheel drive vehicles.

22-9 W-29 is required for servicing and maintenance of a spring facility by the allottees. It also is used by hunters. W-29 is actually about two miles longer than it appears on the map, nearly connecting with W-14: ORV's can presently drive all the way across that part of the WSA. Virtually all of the area in Alternative C can be reached by ORVs using W-29 and taking advantage of topography. Although illegal travel in the WSA can be discouraged, "closure" is a practical impossibility. In regard to the area near W-06, the wilderness character in that vicinity is marginal at best.

22-10 W-17 and W-29 are ways that were present prior to the illegal construction activity. The county did blade these ways into roads as well as constructed new roads. None of these roads were considered in the proposal not to recommend the WSA for designation. Since Mineral County was informed that their road building activity was illegal and would have no effect on the status of the WSA they have cooperated fully with BLM by blocking access to the newly built roads at their expense. Given this it was determined that prosecution would be inappropriate.

Comment Letter 23

Water Resources • Environmental • Planning Consultant

JOHN HART

Box 556
XXXXXXXXXX
San Anselmo, California 94960
XXXXXXXXX

Nov. 4, 1984

Mr. Thomas J. Owen
District Manager
Carson City District
Bureau of Land Management
Carson City, Nevada 89701

Dear Mr. Owen:

Thank you for the opportunity to comment on the Draft RMP and EIS for the Walker Resource Area.

I would like to urge that Alternative D be adopted with respect to the two Wilderness Study Areas, subject only to such minor boundary changes as might suggest themselves for manageability's sake.

I cannot claim to have visited either the Burbank Canyons or the Gabbs Valley Range. However, the narrative makes it clear that the wilderness values present in both areas are considerable and that the other resources foregone by wilderness designation are, in fact, negligible.

Thus even the rule of thumb stated in the Wilderness section of Alternative B--"Manage as wilderness only those areas for which wilderness values are higher than other values...." makes wilderness classification seem the proper solution. Manageability problems would provide the only excuse for not recommending designation, and this justification should be given only modest weight. Only major and pervasive manageability problems, in my view, would provide a convincing reason for recommending against wilderness status for an otherwise qualified area.

Since the land is qualified for wilderness, I urge you to look for ways of solving management problems, rather than making management problems a rationale for proposing no classification at all.

Sincerely,

John Hart

John Hart

Comment Letter 24

HOPKINS R. FITZPATRICK
ENGINEER OF MINES
3260 ARGO WAY
RENO, NEVADA 89509 89509
(702) 329-0949

February 11, 1985

U. S. Department of Interior
Bureau of Land Management
Federal Building, Room 3008
300 Booth Street
Reno, Nevada 89509

Gentlemen:

Re: The Burbank Canyons WSA,
NV-030-525a

Please consider this letter as a protest of the Burbank Canyons Wilderness Study Area (WSA), Walker Resource Area Nevada, decisions in the Carson City District.

I write this protest for the following reasons:

1. Subject area is not a wilderness, nor does it provide solitude. The area is certainly scenic. The scenery includes in the landscape: roads, mining activities, farming or ranching, and habitations with all the noise and sounds generated by such development. Most noticeable are sounds of auto or truck traffic, barking of dogs, sounds of cattle, percussion sounds best described as hammering, and over all a humming or buzzing sound being a blend of much lesser noises. Solitude of sight can be found in limited areas of some of the ravines and small gorges (designated canyons in the subject area) unless existing roads were being used, but solitude of sound is nowhere available.

2. Subject area is nearly surrounded by paved roads and partly dissected by long-used unimproved dirt roads and more recent jeep trails, all of which are used by prospectors, miners, stockmen, hunters, fishermen, rock hounds and others. If the area is designated as wilderness, it will mean the closing of most of the existing roads within subject area so as to artificially imitate one of the several criterions of a true wilderness, which closings would undoubtedly cause management problems.

3. Subject area has long been recognized as having superior mineral potential, only awaiting sufficient technological advances to convert ore of uneconomic grade to ore of

Comment Letter 24

U. S. Dept. of Interior
Bureau of Land Management
Reno, Nv. 89509
February 11, 1985
Page 2

economic grade. Clients of mine have completed an aerial geophysical survey this past fall of a portion of subject area, together with other areas; and have located several anomalies that show definite promise and some anomalies of lesser intensity. I have always supported the premise of multiple use o. Federal lands; and I protest the locking up of potentially valuable minerals within a recognized mineral province in order to grant one segmant of the population exclusive use of Federal lands, thus demying jobs and the use of valuable minerals to all the rest of the population.

4. Subject area, if not designated a wilderness area, will have many management problems for your Bureau; however, if it is designated a wilderness area, the number of management problems can be expected to increase, with some becoming more difficult. The prime reason for the expected increase in management problems is that the area, although relatively small, lies astride the path of population growth along U. S. Highway No. 395, which path extends from the Nevada State line north of Reno to south of Topaz Lake. Locally, the area is bounded on the southwest and south by the rapidly burgeoning settlement east of Holbrook Junction and bounded on the east and southeast by the rapidly expanding developments of Mason Valley and Smith Valley. Also, privately owned patented land used for mining forms property islands within subject area that should cause some acute problems for surrounding areas to be managed as wilderness.

5. If subject area is designated a wilderness area with closing of most of the existing roads within the area, then to the present off-road vehicle use for vehicle recreation and off-road vehicle hill climb testing will be added other off-road two-, three- and four-wheel vehicles that formerly used the existing roads. The existing network of so-called jeep trails can thus be expected to rapidly expand to the degree that, in order for much of the area to be managed as wilderness, will require policing.

The Bureau personnel has a difficult job to do under the best conditions, and those of us who have long been in the mining business understand many of your basic problems and have admiration and respect for the competence the Bureau has shown in managing its many diverse activities. Football coaching always admonishes

Comment Letter 24

U. S. Dept. of Interior
Bureau of Land Management
Reno, Nv. 89509
February 11, 1985
Page 3

quarterbacks against trying to "force it." I have the same suggestion for you regarding the Burbank Canyons WSA, NV-030-525a: that, if you try to "force it", nearly everyone will come to regret it.

With best wishes for your continued success.

Sincerely yours,

Hopkins R. Fitzpatrick

HRF/hlf

cc: U. S. Department of Interior
Bureau of Land Management
Carson City District
Carson City, Nevada 89701

Testimony

Reno Hearing
TESTIMONY

Charles Watson:

1. "There is a strip on the southeast side which is extremely colorful and beautiful. It closely resembles the kind of spectacular thing that we see in Artist Drive in Death Valley National Monument....this colorful, very...what we call the Malapie area in the southeast part of Gabbs Valley Range."

2. "NORA must protest any attempt to consider what Congress might or might not do in the future.

   ...We have to--the BLM must restrict itself to what existing law mandates them to do. It's irrelevant to say that some day in the future a wilderness study area might be subject to Class I air status, when it is not now subject to such status.

   So no decision can be made based on speculation on whether there is something going to be done by Congress or not. I object to this, we protest this."

Response

Reno Hearing
Responses

1. The area referred to does have colorful rock formations, however, that alone does not qualify an area for designation as wilderness. Much of the area is outside the boundaries of the WSA due to the extensive mining activity and the number of roads. Portions within the WSA also have the highest mineral potential and interest in the WSA. Therefore, the area was not recommended for designation as wilderness.

2. No consideration was given to potential future Congressional actions in developing wilderness alternatives. Recommendations were developed based on the criteria and quality standards set forth in the Bureau's Wilderness Study Policy.

Testimony

Hawthorne Hearing
TESTIMONY

Robert Warren:

3. "We do, however, raise questions about the Burbank area proposal because it is for a scenic area...because a scenic area, if managed as one would expect it to be managed, primarily to preserve the scenic-cultural-recreational activities in the area and would not automatically cause an exclusion of mining activities or close the lands for mineral entry.

However, my investigation regarding the state office in this matter, on scenic areas, also reveals that the administrator...has substantial powers over the use of scenic areas and how they shall be managed.

He can, if he wishes to, place very tight limitations on any activities including off-road vehicle, mining or ranching.

He could in fact even withdraw lands from mining and thereby prohibit entry for prospecting and eventually prohibit mining activities."

Response

Hawthorne Hearing
Responses

3. The preferred alternative proposes to establish a limited off-road vehicle designation. It does not propose to withdraw the area from mineral entry, therefore mining and mineral exploration will be allowed to continue. The scenic area designation would result in the requirement for Plans of Operation for all mining related surface disturbing activities rather than just those over five acres in size. It is beyond the scope of this document to speculate about whether or not these lands could be withdrawn at some point in the future, however, it should be noted that the scenic area designation does not give BLM management any additional authority in regards to mineral withdrawals.

LIST OF PREPARERS

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